

Data protection notice on Missions management at EUDA

Last updated: 03/2025

1. Introduction / Why do we process your personal data?

This data protection notice explains how the European Union Drugs Agency (EUDA) process your personal data for the purposes of the management of EUDA staff missions. Namely the way EUDA collects, handles and ensures protection of all personal data provided, how that information is used and what rights you may exercise in relation to your data and how can you exercise them.

2. Who is responsible for the processing of your personal data (data controller) and under which legal grounds is it processed?

The European Union Drugs Agency (EUDA), Praça Europa 1, 1249-289 Lisboa, Portugal, is the controller of your personal data for the purposes of the Missions management at EUDA. The data controller¹ is the Head of Unit Resources and Administrative Services.

Any data collected or information provided in the framework described under point 1 above will be processed in accordance with Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

3. What personal data do we collect and further process?

EUDA collects via the 'Mission Management Tool' (MMT), a tool owned and maintained by EUDA which supports the reimbursement and payments to the person Going on Mission (PGM), the following personal data necessary for the processing operation described above:

(a) General personal data on the Person Going on Mission (PGM):

- Full name, date of birth, personnel number, location(s) of mission and transit, the scheduled departure and return time, the means of transport used, the name of the hotel, the start and end time of professional commitments at the mission locations, the budget line to which the mission will be charged, the MMT mission number, invoices with confirmation/info on meals offered by the meeting host, local transport bills if eligible;
- Additional information incl. leave or teleworking linked to the mission, advance payment request, attachments (e.g. meeting invitation & agenda), additional comments by the PGM;
- Other optional data provided by the PGM to the travel agency in order to receive a more personalized service, in particular through their traveller profile (travel agency management tool containing information necessary and/or useful for processing orders and formatted and/or structured by them): mobile phone number, nationality, place of issue and expiry date of the passport, passport number, credit card, contact details of the person who can be called upon to make reservations for the project manager and any preferences in terms of travel conditions, seat and meal.

(b) Special categories of PGM personal data:

- In MMT, data relating to the state of health of the PGM may be processed. Data on a health problem affecting work-related travel may appear in MMT if the PGM is authorised to make a certain travel arrangement and/or to use a certain means of transport (e.g. travel by business class) in derogation from the common rules. In that regard a comment must be added to the file on the basis of a certificate from the EUDA Medical Adviser, which must be uploaded in MMT. The medical certificate must indicate the method of travel/recommended means of transport and the date of validity, without however indicating the specific medical reason justifying the derogation.
- Health data may be processed also in case of an accident or sickness occurring during the PGM travelling and mission. Service providers of EUDA, incl. for risk management services indicated under point 3 may be involved in the data processing. Medical data provided to ISOS is only shared with EUDA if the staff member authorizes the release or the staff member is unable to give

¹ Article 3 (8) of Regulation (EU) 2018/1725 defines controller as: 'the Union institution or body or the directorate-general or any other organisational entity which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by a specific Union act, the controller or the specific criteria for its nomination can be provided for by Union law.'

the authorization. If authorized by the staff member or in case of an emergency, medical data is shared with the Medical Officer of the EUDA.

- The service provider ISOS records Assistance phone calls. The staff member is informed of the recording at the beginning of the phone call. The recording is not shared with the EUDA.

Your personal data are processed because legal requirements for air travel bookings require the data sets and medical data transfer might be necessary to provide a suitable transport service also in case of an accident or sickness.

4. Who has access to your personal data and to whom is it disclosed?

Your personal data may be disclosed to the following:

(a) Recipients inside EUDA:

- a restricted number of EUDA staff who are internally in charge of mission management, including the ADM Unit assuming the Mission Officer function (MO), Finance Sector, I&L Sector, the ICT Service Desk, providing system support, the authorising officer and the security officer.

(b) Recipients outside EUDA:

- Within the EU administration such as EU control and audit bodies: IAS, IAC, OLAF, European Ombudsman, EDPS, CJEU.
- Service providers/contractors of EUDA (using standard contractual clauses of the EU Standard Contract used in Procurements):
 - EUDA's travel agency Top Atlantico (PT): Order Forms for pre-paid travel tickets are exchanged electronically with EUDA's travel agency. In addition, periodical invoices are exchanged electronically between EUDA and the travel agency. To arrange travel bookings, the travel agency is entitled to make onward transfers of extracts of personal data contained in the pre-paid Order Form to airline companies. Furthermore, in case additional services are exceptionally requested, the travel agency is entitled to make onward transfers of extracts of personal data contained in the pre-paid Order Form.
 - Travel risk management services: (International SOS Srl.) As part of the service provision, the contractor offers a 'Tracker' tool, receiving from EUDA's travel agency data related to persons going on mission for EUDA. The purpose is to locate EUDA staff on mission/travellers in exceptional cases for security reasons or in case of an accident. As an optional service to users/travellers, they also have the possibility to download ISOS app on their mobile phone, which is not mandatory, but a personal choice.

5. Are your personal data subject to any international transfers?

No, your personal data is not transferred outside the EU/EEA.

6. For how long do we keep your personal data?

The mission order and reimbursement data together with Order Forms for pre-paid tickets are stored in MMT and in the accounting system ABAC in relation to the reimbursement. Invoices and related documents are kept for a period of five years after the budgetary discharge of EUDA as supporting documents in the sense of Article 75 of the Financial Regulation.

The content of the functional inbox used in the management with the travel agency is cleaned on a two-yearly basis and at any rate upon termination of the relevant service contract. The travel agency will delete all personal data collected upon contract termination.

7. How do we protect your personal data?

Any personal data we collect is kept in restricted access servers, available only to authorised staff through adequate IT security measures. In general, technical measures include appropriate actions to address online security, protect server hardware, software and the network from accidental or malicious manipulations and risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. The 2 data processing contractors are bound by confidentiality agreements as part of their contractual obligations.

8. What are your rights regarding your personal data?

a) How can you verify, modify or delete your personal data?

As the individual to whom the personal data relate, you can exercise the following rights:

1. access to your personal data under Article 17 of Regulation (EU) 2018/1725;
2. rectify your personal data under Article 18 of Regulation (EU) 2018/1725;
3. erase your personal data under Article 19 of Regulation (EU) 2018/1725;
4. restrict the processing concerning yourself under Article 20 of Regulation (EU) 2018/1725; or
5. exercise the right to data portability under Article 22 of Regulation (EU) 2018/1725.

In addition, you can object to the processing of your personal data under Article 23 of Regulation (EU) 2018/1725 for reasons relating to your particular situation. When you contact us to exercise this right, please explain these reasons. We will remove your personal data, unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms.

b) How can you withdraw consent and the consequences of doing this?

Consent can be withdrawn at any time by notifying the EUDA. Withdrawing consent does not affect the lawfulness of processing based on consent before the withdrawal.

9. How long do you have to wait to receive our reply to your data subject rights' request?

After receiving your request, we have one month to provide information on action taken on your request. We may extend this period by two further months, taking into account the complexity and number of the requests. In those cases, we will inform you of the extension and its reasons within one month of receipt of your request.

10. Who can you contact to ask questions or exercise your rights?

In case of any difficulties or questions relating to the processing of your personal data, you may contact the DPO of the EUDA, Gonçalo Felgueiras e Sousa, at the following address; dpo@euda.europa.eu

11. Who can you contact to complain about the processing of your personal data

We encourage you to always contact us, as data controllers, first as described under point 10 above to raise your questions or concerns. In any case, if you believe that your rights under Regulation (EU) 2018/1725 have been infringed, you remain entitled to send a complaint to the EDPS, as a supervisory authority, using the following contact information:

European Data Protection Supervisor (EDPS)
Rue Wiertz 60 B-1047 Brussels,
Belgium