

**EUDA Personal Data Protection Record on
Mission Management at the EUDA**

Part 1 - mandatory records under Article 31 of the new rules (publicly available)

Nr.	Item	
Header – Versioning and reference numbers (recommendation: publicly available)		
1.	Last update of this record	26.02.2025
2.	Reference number:	DPO-055
Part 1 – Article 31 Record		
3.	Name and contact details of controller	Controller: EUDA, Praça Europa 1, 1249-289 Lisboa, Portugal Contact: Dante Storti HoU Resources and Administrative Services info@euda.europa.eu
4.	Name and contact details of DPO	Gonçalo Felgueiras e Sousa, EUDA; dpo@euda.europa.eu
5.	Name and contact details of joint controller (where applicable)	n/a
6.	Name and contact details of processor (where applicable)	The following services act as processors of EUDA on the basis of a procurement contract: a) Travel agency – Top Atlantico. (PT); b) Travel risk management services – International SOS Srl. (B)
7.	Purpose of the processing	To organize missions (travels away from the place of employment in the interest of the service) and authorised travels and the payment and/or reimbursement of related costs. In the management of staff missions, EUDA relies as the owner and manager on/of the online tool MMT ('Mission Management Tool') and on external service providers. The mission management is broken down into internal operations carried out by EUDA and other operations carried out by contractors selected following procurement procedures (travel agency services, mission assistance, including Travel risk management services and insurance).
8.	Description of categories of persons whose data EUDA processes and list of data categories	<p>Categories of persons:</p> <ul style="list-style-type: none"> • EUDA staff (officials, temporary and contract agents, seconded national experts, and on a case-by-case basis also trainees) going on mission (PGM); • Other individuals working for EUDA (consultants, and external experts) • The different service providers (Travel agency; Travel risk management services). <p>Data categories:</p> <p><i>(a) General personal data on the Person Going on Mission (PGM):</i> Full name, date of birth, personnel number, business telephone number, business email address, 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;</p>

		<p>Additional information including leave or teleworking linked to the mission, advance payment request, attachments (e.g. meeting invitation & agenda), additional comments by the PGM;</p> <p>Other optional data provided by the PGM 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.</p> <p><i>(b) Special categories of PGM personal data:</i> In MMT, data relating to the state of health including genetic or biometric data 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.</p> <p>c) Names and email addresses of the services providers.</p> <p>d) Health data may be processed also in case of an accident or sickness occurring during the PGM travelling and mission. Service providers of EUDA, including 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 is unable to give 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.</p> <p>e) 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.</p>
9.	Time limit for keeping the data	<p>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.</p> <p>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. As per contract arrangements, the travel agency will delete all personal data collected upon contract termination.</p>
10.	Recipients of the data	<p><i>(a) Inside EUDA:</i> a restricted number of staff who are internally in charge of missions' management, including the ADM Unit assuming the Local Mission Officer function (LMO), Finance Sector, I&L Sector, the ICT Service Desk, providing system support, the Authorising officer and the Security Officer.</p> <p><i>(b) Outside EUDA:</i> <u>Within the EU administration:</u> EU control and audit bodies such as: IAS, IAC, OLAF, European Ombudsman, EDPS, CJEU. <u>Service providers/contractors of EUDA:</u> a) EUDA's travel agency: 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</p>

		<p>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.</p> <p>b) 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. Recordings of Assistance calls remain within International SOS.</p>
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	n/a
12.	General description of security measures, where possible.	The electronic mission workflow of EUDA is linked to a database where all relevant information is stored on the EUDA servers protected in accordance with the EUDA Security Policy. A filing system for Order Forms, invoices as well as reimbursement documents related to EUDA staff is kept with Finance Sector in the ABAC system.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice	The Data Protection Notices are available as PDFs on the web page for Data Protection Record DPO-055 .