Privacy Statement/ Data Protection Notice

For the processing activity: Online Wellbeing Portal

This Privacy Statement provides information on the processing and the protection of your personal data and on the rights you have as a data subject.

1. TITLE OF THE PROCESSING ACTIVITY

Access to the Online Wellbeing Portal

2. CONTROLLER OF THE PROCESSING ACTIVITY

EUROPEAN DEFENCE AGENCY (EDA)

Human Resources Unit
learninganddevelopment@eda.europa.eu

3. PURPOSE OF THE PROCESSING ACTIVITY

The purpose of this processing activity is to offer EDA staff the option of using, in complete confidentiality, the service offered by Kara Connect, namely the Wellbeing Portal. This Portal offers a variety of resources and tools designed to support the mental and physical wellbeing of staff members of EDA. The Portal is intended to support preventive and early care.

The Portal is operated by Kara Connect serves as the interface between individual staff members and wellbeing professionals. These professionals are experts in areas such as mental health, family and relationships, career development, and physical health. Staff members may browse the Portal and select the professional they feel best meets their needs. The Portal also includes webinars and other resources to promote staff wellbeing.

To facilitate the registration of staff members who wish to use the Portal, following the consent of staff members interested, EDA Human Resources provides Kara Connect with the names and email addresses of those staff members. Kara Connect will then contact each staff member directly to explain how the Portal works and to manage the enrolment process.

EDA shall receive only anonymised usage insights in an aggregated manner, and shall not have access to personal data concerning the support requested or the consultations conducted.

EDA has no role in the operation nor in the management of the Portal.

4. DATA PROCESSED

(a) Categories of data subjects:

EDA Staff members who actively provided their consent and expressed interest in registering to the Portal.

(b) Categories of personal data processed:

Name, surname and EDA e-mail address ('Shared Personal Data').

5. RECIPIENTS OF THE DATA

The internal recipients are:

- Competent functions of the EDA HR Unit.

The external recipients are:

- Kara Connect Ireland Limited, acting as a separate data controller, and the EU/EEA-based processors and sub- processors it engages under written data-processing agreements, listed at: https://trust.karaconnect.com/subprocessors

6. MEANS OF PROCESSING AND MEASURES OF SECURITY OF THE DATA

Shared personal data of users (name, surname, EDA e-mail address) are processed by EDA only to validate their registration and enable their access to the tool. Shared personal data are stored in a secure environment and accessible only to authorised persons on a need-to-know basis.

Information on the means of processing and measures of security by Kara Connect, acting as separate Controller:

- Kara Connect operates an information security management system certified to ISO/IEC 27001:2022 (certification body: British Assessment Bureau / Amtivo; initial certification November 2023, subject to annual surveillance audits) and holds Cyber Essentials certification.
- The Portal operated by Kara Connect is hosted on Amazon Web Services in the EU (Frankfurt, Germany). Technical and organisational measures include encryption of personal data and transport security (TLS); role-based access control; logging and monitoring of access with automated threat detection; regular backups; secure, encrypted channels for the transmission of the Shared Personal Data; confidentiality obligations and annual security-awareness training for personnel; and a documented incident-response procedure under which any personal data breach affecting the Shared Personal Data is notified to EDA without undue delay and, where feasible, within 48 hours. Kara Connect applies data protection by design and by default.
- Further information on the protection measures implemented by Kara Connect is available via its Trust Centre (https://trust.karaconnect.com) and security page (https://karaconnect.com/security).

7. RIGHT OF ACCESS TO YOUR PERSONAL DATA AND OTHER RIGHTS OF THE DATA SUBJECT

Regarding Shared Data, for the registration to the service:
Data subjects have the right to access their personal data, the right to request rectification of any inaccurate or incomplete personal data, the right to erasure, the right to restriction of processing, the right to object to the processing, the right to withdraw their consent, the right to not be subject to automated decision making, as applicable and at any time.

For any queries regarding the processing of personal data, or to exercise these rights, data subjects can contact the data Controller at learninganddevelopment@eda.europa.eu or the Data Protection Officer at dataprotection@eda.europa.eu .

Regarding the use of the service:
Once a staff member has registered on the Kara Connect Portal, personal data and requests concerning the personal data held in their respective user accounts in the Portal (including any health or wellbeing information shared with a wellbeing professional) must be addressed directly to Kara Connect at privacy@karaconnect.com, as the competent controller. Kara Connect handles such requests in accordance with the GDPR (Regulation EU 2016/679). EDA

does not have access nor receives any information from Kara Connect regarding such requests.

8. RETENTION OF THE DATA

The Shared personal data of EDA staff members that actively express their consent and interest to receive access to the Portal, are provided by EDA to Kara Connect once for every staff member, and every new staff member who expresses consent and interest. Access to the Portal is linked to the EDA e-mail account of the EDA staff.

Kara Connect retains the Shared Personal Data (name, surname and EDA e-mail address) only for as long as necessary to register and enrol the staff member in the Portal and to manage the allocation and use of credits (Data Sharing Agreement).

Kara Connect deletes or irreversibly anonymises the data without undue delay once it is no longer necessary for that purpose, upon notification by EDA HR that a staff member has withdrawn consent or no longer requires access, upon termination or expiry of the Agreement, or upon EDA HR's written request, and on request certifies deletion in writing within 10 working days. Copies held in back-up systems are overwritten in accordance with normal retention cycles.

Account data that a staff member subsequently creates on the Portal is governed by Kara Connect's Privacy Policy and is deleted at the staff member's request, or automatically after two years of inactivity (reminders are sent beforehand), with residual copies removed within two months of deletion.

EDA HR will retain the consent given by staff members for 1 year after they leave the Agency.

9. LEGAL BASIS FOR THE PROCESSING OPERATION

The legal basis for the data processing is the consent of the data subject: Article 5(d) of Regulation (EU) 2018/1725.

10. CONTACT DPO

In case you have any questions or queries concerning data protection at the European Defence Agency, you can also contact the Data Protection Officer at dataprotection@eda.europa.eu.

11. RECOURSE TO EDPS

As a data subject you have the right to have recourse at any time to the European Data Protection Supervisor (http://www.edps.europa.eu) at edps@edps.europa.eu.