# PRIVACY STATEMENT

## for the processing operation

## EDA Public Transportation Contribution Scheme

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| **1.** | **INTRODUCTION** |

This Privacy Statement describes the measures taken by EDA to protect your personal data with regard to the EDA Public Transport Contribution Scheme and what rights you have as a data subject.

EDA protects the fundamental rights and freedoms of natural persons and in particular their right to privacy with respect to the processing of personal data (Article 1.1 of Regulation No 2018/1725).

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| **2.** | **CONTROLLER OF THE PROCESSING OPERATION** |

EUROPEAN DEFENCE AGENCY
Rue des Drapiers 17-23
B-1050 Brussels
www.eda.europa.eu

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| **3.** | **PURPOSE OF THE PROCESSING** |

The purpose of the processing activity "EDA Public Transportation Contribution Scheme" is to provide eligible EDA staff (temporary, contract agents, SNE and cost free SNE, and trainees) with the possibility to apply for a contribution towards the costs of public transportation used for commuting to and from work, as set out in the general conditions of enrolment to the EDA public transport contribution scheme.

This processing requires the handling of personal data, making use of an EDA-internal workflow in the IT application "Flowforma".

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| **4.** | **DATA PROCESSED** |

Data subjects concerned are all EDA internal (staff).

The following personal data is processed through a workflow in the Flowforma application:
- Full name of ticket holder submitting the request
- Full name staff member handling the request
- Scan of face side of transport card (incl. photo and identification data of the staff member submitting the request)
- Proof of purchase showing the staff member's name, the price paid, the type of pass and its period of validity, and the provider

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| **5.** | **RECIPIENTS OF THE DATA** |

The following limited personal data to distinguish workflows can be seen by staff members connecting to Flowforma:

- Full name of ticket holder requesting reimbursement
- Full name of staff member processing the request

All other personal data (namely supporting documents, financial details, scan of transport card and proof of purchase etc) is only visible to the authorised actors involved in the specific workflow:

- EDA staff member entering request for reimbursement (only access to own file);
- Authorized HR staff in charge of validating requests;

- Finance Unit team in charge of payments;
- The IT team in charge of the maintenance of the web application;
- Others on a need-to-know basis (e.g. Internal Auditor, DPO, Legal Office).

## 6. PROTECTION AND SAFEGUARDING OF THE DATA

Data is stored in Flowforma application.

EDA has implemented appropriate technical and organisational measures (firewalls, checkpoints, antivirus) to ensure a level of security appropriate to the risks represented by the processing and the nature of the personal data to be protected. Such measures have been taken in particular to prevent any unauthorised disclosure or access, accidental or unlawful destruction or accidental loss, or alteration and to prevent all others unlawful forms of processing.

## 7. RIGHT OF ACCESS AND RECTIFICATION OF THE DATA

Data subjects have the right to access their personal data and the right to correct any inaccurate or incomplete personal data, as well as to request the removal of their personal data, which will be implemented within 15 working days after the request has been deemed legitimate.

If the data subject has any queries concerning the processing of his/her personal data, s/he may address them to the data controller at the following mailbox: edahrtransport@eda.europa.eu

Justified requests for blocking and erasure are treated within 15 working days after the request has been deemed legitimate.

## 8. TIME LIMIT FOR STORING DATA

The data stored in Flowforma are kept for a maximum period of 5 years. Staff members are required to keep all original supporting documents for a period of 5 years and provide them to the EDA HR Unit upon request in case of an audit.

A final report, containing anonymised data only, may be kept for an unlimited time.

EDA may retain anonymous data for statistical purposes. EDA pays particular attention to preserve anonymity of personal data for these purposes, especially to all the measures necessary to avoid indirect identification.

## 9. LEGAL BASIS FOR THE PROCESSING OPERATION

Article 5(1)(a) and (d) of Regulation 2018/1725;

Article 31 of Council Decision (CFSP) 2015/1835 of 12 October 2015 defining the statute, seat and operational rules of the European Defence Agency.

## 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.

## 12. ADDITIONAL INFORMATION

More information on Data Protection at the European Defence Agency can be obtained on our public website https://www.eda.europa.eu/Aboutus/how-we-work/data-protection.