

PRIVACY STATEMENT

for the processing operation

“Staff learning and development”

1. INTRODUCTION

This Privacy Statement describes the measures taken to protect your personal data with regard to the action involving the present data processing operation 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).

2. CONTROLLER OF THE PROCESSING OPERATION

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

3. PURPOSE OF THE PROCESSING

EDA processes personal data in order to provide staff with (continuous) learning and development possibilities while in employment with the Agency.

The purpose of this processing operation is to:

- Plan and organize learning and development (L&D) activities for EDA staff
- Monitor the training budget
- Manage all the procedures regarding L&D actions
- Keep a training history of the EDA staff
- Evaluate the L&D actions in view of quality control

Learning and development offers include:

- EU Learn online and presence trainings
- EDA in-house and internal trainings
- Training/coaching programmes
- External training courses

4. DATA PROCESSED

Categories of data processed may include:

1. Identification data

- Name
- Date of birth and ID number (for courses organized by the European Security and Defence College)

2. Contact data

- Email address
- Address

- Phone number

3. Other (if required)

- Job title, name of Directorate/Unit/Office

The Learning Management System also records the anonymized evaluation provided by the course participants on a voluntary basis after the training in order to guarantee the quality of the training.

The system provides the possibility for statistical reports about evaluations regarding the trainers and the courses.

5. RECIPIENTS OF THE DATA

The recipients are:

- EDA HR staff dealing with L&D, the Corporate Services Director, the Chief Executive, the Deputy Chief Executive, the Line Manager of staff member(s) requesting a training, EDA internal trainers;
- Other EDA staff on a need-to-know basis (Internal auditor, Finance, DPO, Legal)
- External contractors, i.e. specific training organiser and trainer (for enrolment and attendance list)
- Others on a need-to-know basis (e.g. supervisory authorities, courts etc.).

6. PROTECTION AND SAFEGUARDING OF THE DATA

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 other 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:

learninganddevelopment@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

For files that are closed without follow-up, the time limit for storage is as follows:

For the data processed by EDA:

Presence lists are kept for a maximum of 15 years after the training:

- Taking account of the maximum number of 10 years of service at EDA, plus 5 years after end of service as also defined for EU Learn
- For justification of the payment of the external contractor in accordance with the periods determined under the Financial Regulation as justification for the payment of contractors/training providers invoices (5 years after discharge).

For the data in EU Learn:

- Training records in EU Learn are kept for the duration of the staff member's career in the EU Institutions and 5 years after the end of service or contract in accordance with the EU Learn Privacy Policy.

For data processed by external service providers:

- Retained only as long as necessary for the performance of the programme.
- Data obtained in surveys and/or in interviews are stored in electronic form on servers maintained by the training provider. The processor will delete the data it holds for the purposes of this processing operation as soon as the programme is terminated (end of specific contract with EDA).

For files that lead to a follow-up (internal investigations, disciplinary procedure) data will be retained for the period of time stipulated by these follow-up procedures.

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), (b) of Regulation 2018/1725;
- Article 11 & 31 of Council Decision 2015/1835 of 12 October 2015 defining the statute, seat and operational rules of EDA.
- Article 30 & 104 of EDA Staff Regulations (for TA and CA)
- EDA learning and development framework

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>.