

PRIVACY STATEMENT

for the processing operation of management of service mobile telephone invoices

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

The purpose of the processing is the verification of invoices in order to ensure that the use of the mobile phone by each staff member does not exceed the "flat rate", in other words, the verification of detailed invoices in case of high invoiced amounts. The need to process data is considered necessary for the management and functioning of EDA. As the policy states service mobile phones are a professional tool and provided to certain members of staff in the context of performance of professional activities.

4. DATA PROCESSED

The itemized invoices include the following data, which are processed:

-basic staff information including name, EDA mobile number and monthly cost;

- form of communication (text or call, but not the content of communication);
- numbers called;
- the destination, the time, the duration of each call;
- the location from where the call was placed.

5. RECIPIENTS OF THE DATA

IT and Finance staff involved in payment and verification of invoices.

6. PROTECTION AND SAFEGUARDING OF THE DATA

As a general rule, EDA IT sends regular messages relating to Security, in particular in relation to the handling of personal data on IT systems in EDA. This, along with regular training on data protection matters (namely, induction to newcomers and general information session for all staff), ensures an adequate level of information of EDA staff to the measures necessary to ensure the security of processing.

In addition, EDA units are subject to the internal audits performed by the Agency Internal Auditor. The areas subject to internal audit are determined in accordance with EDA rules and procedures as set out by the EDA Financial Rules, namely the ley areas agreed on an annual basis with senior management. EDA staff is bound by the EDA Staff Regulations which provide for a duty of confidentiality. This along with the other key staff obligations in relation to performance ensures an overall understanding of the requirements when handling personal data.

In this particular processing operation, the controller has implemented appropriate technical and organisational measures to ensure an appropriate level of security. The security risk assessment is currently performed on an ad hoc basis by the controller with the support of the DPO and follows the provisions of Regulation 2018/1725 to this regard.

7. RIGHT OF ACCESS AND RECTIFICATION OF THE DATA

The data subjects have the right to access, rectify, block and request the erasure of their personal data in accordance with Regulation 2018/1725. Data subjects may at any time consult the data controller or service responsible for the processing of personal data or have recourse to the European Data Protection Supervisor (edps@edps.europa.eu).

The data subject shall address any queries concerning the processing of his/her personal data to the Data Controller or the EDA DPO (dataprotection@eda.europa.eu).

In case of access request, the controller shall react within a time limit of 1 month. Requests for rectification shall be handled without delay.

8. TIME LIMIT FOR STORING DATA

The general billing information shall be stored for 5 years after the discharge as required by the provisions of the Financial Regulation and its Rules of application for audit and discharge purposes.

The itemized invoices are deleted immediately after the verification and in any case no later than 6 months after the processing, except where needed for financial or disciplinary follow-up.

9. LEGAL BASIS FOR THE PROCESSING OPERATION

Article 5(a) 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 <u>dataprotection@eda.europa.eu</u>.

11. RECOURSE TO EDPS

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

12. ADDITIONAL INFORMATION

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