



PRIVACY STATEMENT – DATA PROTECTION NOTICE

FOR THE PURPOSE OF PROCESSING PERSONAL DATA

RELATED TO THE LOGISTIC AND FINANCIAL SUPPORT OF THE CSDP WAREHOUSE PROCESSED THROUGH THE ENTERPRISE RESOURCE PLANNING (ERP)-SYSTEM BY THE COMMON SECURITY AND DEFENCE POLICY (CSDP) MISSIONS, BY THE CPCC DIRECTORATE OF THE EUROPEAN EXTERNAL ACTION SERVICE (EEAS), BY THE SERVICE FOR FOREIGN POLICY INSTRUMENTS (FPI) OF THE EUROPEAN COMMISSION AND BY THE CIVILIAN COMMON SECURITY AND DEFENCE (CSDP) MISSIONS

1. INTRODUCTION

THE PROTECTION OF YOUR PRIVACY INCLUDING YOUR PERSONAL DATA IS OF GREAT IMPORTANCE TO THE EUROPEAN EXTERNAL ACTION SERVICE (EEAS), THE SERVICE FOR FOREIGN POLICY INSTRUMENTS (FPI) AND THE CIVILIAN (CSDP) MISSIONS. WHEN PROCESSING PERSONAL DATA WE RESPECT THE PRINCIPLES OF THE CHARTER ON FUNDAMENTAL RIGHTS OF THE EUROPEAN UNION, AND IN PARTICULAR ARTICLE 8 ON DATA PROTECTION.

THIS PRIVACY STATEMENT DESCRIBES HOW THE EEAS; THE FPI; THE CSDP MISSIONS; AND THE SWEDISH CIVIL CONTINGENCIES AGENCY (MSB) AS DATA PROCESSOR, HANDLE YOUR PERSONAL DATA FOR THE PURPOSE IT IS COLLECTED AND WHAT RIGHTS YOU HAVE AS A DATA SUBJECT.

YOUR PERSONAL DATA IS PROCESSED BY THE EEAS AND THE FPI IN ACCORDANCE WITH REGULATION (EU) 2018/1725 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 23 OCTOBER 2018 ON THE PROTECTION OF NATURAL PERSONS WITH REGARD TO THE PROCESSING OF PERSONAL DATA BY THE UNION INSTITUTIONS, BODIES, OFFICES AND AGENCIES AND ON THE FREE MOVEMENT OF SUCH DATA, AND REPEALING REGULATION (EC) NO 45/2001 AND DECISION NO 1247/2002/EC AS OF 11 DECEMBER 2018, ALIGNED WITH PROVISIONS OF THE GENERAL DATA PROTECTION REGULATION /REG. (EU) 2016/679/ AND BY THE CSDP MISSIONS IN ACCORDANCE WITH THE CIVILIAN OPERATION COMMANDER (CIVOPSCDR) INSTRUCTION 12-2018 AND ITS SUBSEQUENT AMENDMENT(S) ON THE STANDARD OPERATING PROCEDURE (SOP) ON THE PROTECTION OF PERSONAL DATA FOR CSDP MISSIONS.

ALL DATA OF PERSONAL NATURE - DATA THAT CAN IDENTIFY YOU DIRECTLY OR INDIRECTLY - IS HANDLED WITH THE NECESSARY CARE.

2. PURPOSE OF DATA PROCESSING: Why do we process your data?

The main purpose of the data processing activities is to develop and uphold a centralised database of inventory and an asset management IT-system, called "Enterprise Resource Planning" system for the Civilian CSDP Missions.

The ERP System is an innovative IT solution to provide the civilian CSDP Missions, the EEAS and the Commission/FPI with a common system to manage the inventory and the assets of the Missions as well as to perform other subsidiary function such as in the process of payrolls and salaries. Personal data is processed in relation to these tasks.

I. The centralised inventory and asset management system database of the ERP, in particular:

- facilitates the administration of the inventory and asset management of the Missions,
- increases the transparency of who has what in terms of assets and other valuable terms,
- simplifies the financial management of the CSDP Missions,
- facilitates the procurement process of assets,
- simplifies the planning and establishment of new CSDP Missions;
- facilitates the Missions, the CPCC, the FPI and the Member States (MS) with statistics and reports on inventory and asset management,
- supports the technical solution to broaden the scope of the ERP-system at a later stage in order to get a complete system for the management of the inventory and i.e. procurement.

II. The centralized financial management system database of the ERP, in particular:

- facilitates the verification and the monitoring of the management of the operational budget of the CSDP Missions,
- facilitates the Missions, the CPCC, the FPI and the Member States (MS) with statistics and reports on salaries and payrolls, and
- facilitates the payment process on the basis of the data collected in ERP.

Your personal data will not be used for an automated decision-making including profiling.

3. DATA PROCESSED: What data do we process?

The data, including personal data, which may be processed for that purpose are the following:

1. Surname(s) and middle name(s) and first name(s)
2. CIMA Employee ID number
3. Mission ID card number
4. Arrival date (to the Mission)
5. End of Mission date
6. Employee Regime (seconded/international contracted/local)
7. Position/Title/Function
8. Professional phone number with extension
9. Professional mobile phone number
10. Professional e-mail address
11. Identification of third country staff members (tick box)
12. Division
13. Division ID
14. Department
15. Department ID
16. Section
17. Section ID
18. Unit
19. Unit ID
20. Office Location
21. Salaries
22. Grade and Step
23. Removal Allowance
24. Per diem amount Allowance
25. Bank account number
26. Hardship Amount Allowance
27. Risk Allowance Amount
28. Deduction, only when applicable

4. DATA CONTROLLER: Who is entrusted with processing your data?

Organisational entities responsible for managing the data processing activities are the following:

EEAS Civilian Planning and Conduct Capability Directorate (CPCC) and the EEAS Mission Support Division (CPCC/MSD) All operating Civilian CSDP Missions (EULEX Kosovo, EUMM Georgia, ECAP Sahel Mali, EUCAP Sahel Niger, EUCAP Somalia, EUBAM Rafah, EUBAM Libya, EUPOL COPPS, EUAM Ukraine, EUAM Iraq, EUAM RCA) for the data collected in their respective Missions, as well as the Service for Foreign Policy Instruments (FPI) of the European Commission and Common Foreign and Security Policy Operations Unit (FPI.3 – CFSP Operations)

5. RECIPIENTS OF THE PERSONAL DATA: Who has access to your data?

I. As for personal data 1-20 listed in point 3:

Within the EEAS:

- Assigned CPCC/MSD/Mission Support Platform (MSP) personnel responsible for Logistics, IT, Finance and Procurement – on a need-to-know/need-to-do basis, administrator rights.
- Assigned CPCC/MSD/Mission Support Platform (MSP) personnel responsible for Logistics, IT, Finance and Procurement – on a need-to-know with only viewer rights.
- Assigned staff of the CPCC responsible for Logistics, IT, Finance and Procurement – on a need-to-know basis with only viewer rights.

Outside the EEAS:

In the CSDP Missions:

- Assigned CSDP Mission Members responsible for Logistics, Finance and Procurement – on a need-to-know/need-to-do basis, administrator rights.
- Assigned CSDP Mission Members responsible for Logistics, IT, Finance and Procurement – on a need-to-know with only viewer rights.

In the Commission (FPI):

- Assigned staff of FPI/Mission Support Platform (MSP) responsible for financial management and procurement of CSDP Missions – only on a need-to-know basis with only viewer rights.
- Assigned staff of FPI responsible for financial management (Programme Managers for each CSDP Mission) – only on a need-to-know basis with only viewer rights.

In the MSB as data processor:

- Assigned staff of the MSB which owns runs and maintains the ERP system, only on a need-to-know basis with only viewer rights. The MSB does not collect, alter or delete personal data. Secure storage of personal data will be ensured by MSB.

As for personal data 21-28 listed in point 3:

Within the EEAS:

- Assigned CPCC/MSD/Mission Support Platform (MSP) personnel responsible Finance and Procurement – on a need-to-know basis with only viewer rights.
- Assigned CPCC/MSD personnel responsible for Finance and Procurement – on a need-to-know basis with viewer rights.

Outside the EEAS:

In the CSDP Missions:

- Assigned CSDP Mission Members responsible for Logistics and Finance – on a need-to-know/need-to-do basis, administrator rights.
- Assigned CSDP Mission Members responsible for Logistics and Finance – on a need-to-know basis with only viewer rights.

In the Commission (FPI):

- Assigned staff of FPI responsible in the MSP for financial management and procurement of CSDP Missions – only on a need-to-know basis with only viewer rights.
- Assigned staff of FPI responsible for financial management (Programme Managers) for each CSDP Mission – only on a need-to-know basis with only viewer rights.

In the MSB as data processor:

- Assigned staff of the MSB which owns, runs and maintains the ERP system, only on a need-to-know basis with only viewer rights. The MSB does not collect, alter or delete personal data. Secure storage of personal data will be ensured by MSB.

6. ACCESS, RECTIFICATION, ERASURE OF DATA: What rights do you have?

You have the right to access your personal data and the right to request for correction of any inaccurate or incomplete personal data. When applicable, you have the right to request erasure of your personal data, to restrict the processing of your personal data, the right to data portability as well as the right to object to the processing, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

If you wish to exercise your rights or if you have any questions concerning the processing of your personal data, you may address them to the following functional mailbox of the respective Data Controller:

CPCC MSD: CPCC-MSD-SECRETARIAT@eeas.europa.eu

FPI.3 (FPI DATA PROTECTION): FPI-DATA-PROTECTION@ec.europa.eu

EUCAP Somalia Mission: data-protection@eucap-som.eu

7. LEGAL BASIS: On what grounds we collect your data?

We process your personal data, because:

(a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body;

(b) processing is necessary for compliance with a legal obligation to which the controller is subject.

In particular, the applicable legal provisions are the following:

- COUNCIL DECISIONS establishing the respective Civilian CSDP Missions.
- COUNCIL DECISION (CFSP) 2018/653 of 26 April 2018 on the establishment of a warehouse capability for civilian crisis-management missions including its Annexes.
- Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union (OJ – L 193/30.07.2018, p. 1).
- European Union Delegation Agreement concluded between the European Commission and the Warehouse II operator, MSB (Ref. CFSP/2018/11/CSDP Warehouse II) Ares(2018)2842861 – 31/05/2018).
- European Union Delegation/Contribution Agreements concluded with all CSDP Missions.
- Service Level Agreement concluded between EEAS/CPCC, Commission/FPI and the CSDP Missions for the last ones' financial contribution to the Mission Support Platform (MSP).
- Vade-mecum on financial and accounting management of CSDP Missions (Ref. Ares(2018)1718812 – 28/03/2018).
- Delegation Agreement signed between Swedish Civil Contingencies Agency (MSB) and the Service of Foreign Policy Instruments (FPI) of the European Commission on 30/05/2018 (Ref. CFSP/2018/11/CSDP Warehouse II).
- Conclusions of the Council (8022/16) on the Mission Support Platform (MSP).
- Point 17/A. of the Conclusions of the Council on CSDP (8971/15) on the role of the Mission Support Platform.
- Point 13 of the Conclusions of the Council (9178/17) on the Security and Defence in the context of the EU Global Strategy.

- Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Communities (OJ 45, 14.06.1962, p. 1385).
- PROC HR(2011)0013 of 22/11/2011 on general implementing provisions giving effect to the Staff Regulations and to the Conditions of Employment of Other Servants.
- PROC EEAS(2011)002 of 29/11/2011 to extend the application of certain Commission Rules developing the provisions of the Staff Regulations and of the Conditions of Employment of Other Servants, to the EEAS.
- Article 1 (Nature and Scope), 2 (Tasks) of the Council Decision of 26 July 2010 establishing the organisation and functioning of the European External Action Service (2010/427/EU) available on http://www.eeas.europa.eu/background/docs/eeas_decision_en.pdf.
- Service Level Agreement between the Service of Foreign Policy Instruments (FPI) and the European External Action Service (EEAS) (Ref. Ares(2013)3719368 -13/12/2013).

Good administrative practices, contacts and cooperation necessary for the EEAS to perform its tasks pursuant to the Treaty on the Functioning of the European Union and the aforementioned Council Decision establishing the EEAS.

8. TIME LIMIT – DATA STORING: For what period and how we process your data?

Retention of data:

- Personal data such as enlisted above under point 3 are retained for 5 years after the end of service of the respective Mission Member for the purpose of audit and eventual investigation.
- In case of a judiciary procedure related to employment of contracted staff or tour of duty of the seconded staff, personal data is kept for 5 years after the final judgment was rendered.
- In case of a complaint launched before the European Ombudsman or before the European Data Protection Supervisor or an investigation conducted by OLAF or by EPPO or a verification by the European Court of Auditors, personal data is kept for 5 years after the closure of the case.

Security of data:

Appropriate organisational and technical measures are ensured:

- In its electronic format the data will be stored on the MSB server located in Sweden. The collected personal data are processed by assigned staff members. Files have authorised access. The database is accessible only to the recipients with the authorised administrative or viewer rights with a legitimate need to know for the purposes of this processing operation.
- MSB is bound by an agreement for any processing operations of your data, and by the confidentiality obligations deriving from General Data Protection Regulation ('GDPR' Regulation (EU) 2016/679).
- Measures are provided by MSB/EEAS to prevent non-responsible entities from access, alteration, deletion, disclosure of data.
- Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed.
- Security is also ensured by the safety measures built in the various IT applications used.
- Technical and organisational measures are also guaranteed pursuant to Article 33 Regulation (EU) 2018/1725.
- Additional measure regarding processing carried out by the European Commission/FPI.3: All processing operations are carried out pursuant to the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

9. DATA PROTECTION OFFICER: Any questions to the DPO?

After having exhausted your possibilities to submit queries in accordance with the Standard Operating Procedure on the protection of personal data for CSDP Missions, you can also contact the EEAS Data Protection Officer at data-protection@eeas.europa.eu or the Data Protection Officer of the European Commission at DATA-PROTECTION-OFFICER@ec.europa.eu

10. RECOURSE: Where to turn?

With regard to the processing of personal data by the Mission, you are requested to turn to the Mission Data Protection Advisor of the relevant Mission with any concerns or complaints. With regard to the personal data processed by the CPCC or by the FPI you are encouraged to submit complaints to the respective institutions and you have the right to lodge a complaint to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data.

DISCLAIMER

The present Privacy Statement is subject to adjustments in line with the completed internal data protection procedure arrangements of both the EEAS and the FPI of the European Commission.