

## **PRIVACY STATEMENT**

### **SYSPER - Collection and use of private contact data of officials and other servants for central administrative purposes**

#### **1. Context and Controller**

This privacy statement explains why we process, how we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you may exercise in relation to your data (the right to access, rectify, block etc.).

As the CAJU collects and further processes personal data, it is subject to *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.*

Processing operations are under the responsibility of the Controller, the CAJU.

The CAJU may be contacted by sending an e-mail to [info@clean-aviation.eu](mailto:info@clean-aviation.eu) or at the following postal address: TO 56-60, 1049 Brussels, Belgium.

#### **2. What personal information do we collect, for what purpose, through which technical means and under which legal bases?**

##### **Types of personal data**

In order to carry out this processing operation CAJU collects these categories of personal data:

For the ordinary administration of officials and other servants:

- First and family name
- Private home address
- Private home phone number
- Private mobile number, if any
- Service mobile phone, if any
- Private e-mail address, if any

In the framework of the Protocol of Privileges and Immunities, private details of officials and other servants and their family members:

- First and family name
- Civil status
- Date of birth
- Nationality



- Date of move to the workplace
- Full private home address

In the framework of access to the Digital Key for staff residing in Belgium:

- For Officials and other servants: Personal ID, Full Name, Date of birth, National registration number (NISS/BIS), and email address.
- For their family members (if any): Full Name, Date of birth, Relation with the staff member, National registration number (NISS/BIS), and email address.

### **Purpose and Technical means of personal data processing**

The purpose of the collection of the data above is:

- To collect private contact details of staff and make them available at corporate level for Business Continuity Management purposes, i.e. to prepare (exercises) and respond to crises and operational disruptions affecting the normal functioning of the Commission.
- To allow DG HR (medical service, social workers, investigators), OLAF or PMO to contact punctually staff (or their family) for administrative and / or urgent reasons. Such contact may be required in the interests of the service or to inform staff of a situation which could impact upon their ability to carry out their assigned tasks.
- To enable security services to contact at any time their correspondents in Directorate Generals in case of changes of the state of alert.
- To authenticate some activities of the staff members such as remote access to Commission files, or switching the professional line to the private line in case of telework (DG DIGIT).
- To allow DG HR to transfer to the hosting Member States data on staff as required by the PPI (Article 15) and in line with other legal basis.
- To allow DG HR to collect and transmit to relevant Belgian authorities data of staff members and their family members residing in Belgium for the purpose of obtaining a 'digital key' (a user name and password) which allows access to all federal public sites, local sites, including the Ma Santé portal relevant in the context of Covid-19 certificates.
- Any other administrative work life related purpose

The CAJU will not process the collected data for any other purpose than those described above. Recruitment files are stored electronically and access is protected by the management of the access rights. Paper documents are archived in physical files and stored in a locked cabinet until their destruction.

### **Legal basis**

This transfer of personal data is necessary to comply with the Protocol on the Privileges and Immunities of the European Union, Article 15 and the sincere cooperation foreseen in the TEU Article 4 (3). Data Processing shall comply with the provisions of Article 5 (a, b, d, e) of Regulation (UE) 2018/1725 .

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;
- (c) The data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- (d) Processing is necessary in order to protect the vital interests of the data subject or of another natural person.

For access to the Digital Key for Belgian residents processing is based on Articles 11 and 15 of the Protocol (No 7) on the Privileges and Immunities of the European Union, European Commission Decision of 5 March 2021 on the transmission of personal data of Commission staff, pensioners and their family members to national health authorities in the context of COVID-19 vaccination and consent of the data subjects.

### **3. Who has access to your personal data and to whom is it disclosed?**

For the purposes detailed above, access to your personal data is given to the following persons:

Authorised CAJU staff on a “need to know” basis have access to your personal data for the purposes of carrying out this processing operation.

Access to your personal data is also provided to the Commission staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Generated lists are sent to the Permanent Representations of the EU member states.

Recipients in the framework of the access to the Digital Key for Belgian residents is the Belgian authority - the DG Digital Transformation of the Federal Public Service Strategy and Support (La DG Transformation digitale du Service Public Fédéral Stratégie et Appui) based on the joint controllership agreement. You may find it attached to the data protection record with the reference number: DPR-EC-02013.

### **4. What are your rights and how can you exercise them?**

#### **Access**

In case you wish to access your personal information, you can contact the CAJU Data Protection Officer at [Data-Protection@clean-aviation.eu](mailto:Data-Protection@clean-aviation.eu)



You may make a request to access the CAJU Register of data processing operations in order to obtain more detailed information on how we treat and protect your personal data, in accordance with Article 17 of Regulation (EU) 2018/1725.

### **Rectification**

You can, if need be, rectify any inaccurate personal data throughout the entire selection process by sending a written request to the above mentioned email address. You cannot, however, send us any changes of your personal data related to the admissibility criteria after the application deadline.

### **Erasure**

You may make a request for erasure of your personal data under the conditions laid down by Article 19 of Regulation (EU) 2018/1725. In this case, you should send us a written request to the same email address mentioned under section “Access”.

We will respond to your request without undue delay and at the latest within one month.

You could further request cancellation of your application and deletion of all linked personal data by making use of the contact information mentioned above.

### **Restriction of processing**

You may make a request for restricting the processing of your personal data under the conditions laid down by Article 20 of Regulation (EU) 2018/1725 for the following reasons: you would like to contest the accuracy of the personal data; you consider that the processing is unlawful and you would oppose the erasure of the personal data and request the restriction of the use of the personal data instead; when the CAJU as controller no longer needs your personal data for the purposes of the processing, but it is required by you as data subject for the establishment, exercise or defence of legal claims; or when you have objected to processing pursuant to Article 23(1) of Regulation (EU) 2018/1725, pending the verification of legitimate grounds.

In this case, you should send us a written request to the same email address mentioned under section “Access”.

### **Right to data portability**

You have the right to receive the personal data, which you have provided to us in a structured, commonly used, and machine-readable format, and you may also request us to transmit this data to any other controller under the conditions of Article 22 of Regulation 2018/1725. In this case, you should send us a written request to the same email address mentioned under section “Access”.

### **Right to object**

You may object at any time to processing of your personal data under the conditions laid down by Article 23 of Regulation (EU) 2018/1725, on grounds relating to your particular situation. In this case, you should send us a written request to the same email address mentioned under section “Access”.



**NB:** Please note that access to your personal data and its modification or deletion may be restricted by the CAJU Internal Rules restricting data subjects rights<sup>1</sup> as provided for by Article 25 of the Regulation. In that context, these rights may be restricted by the CAJU on a case-by-case basis in line with the Internal Rules, where necessary and appropriate for the purposes.

## **5. How long do we keep your personal data?**

CAJU will only keep your personal data for the time necessary to fulfil the purpose of collection or further processing, namely until 8 years after the extinction of all the rights.

## **6. Contact information**

For any questions related to your rights, feel free to contact the Data Controller at [Data-Protection@clean-aviation.eu](mailto:Data-Protection@clean-aviation.eu) by indicating 'Data Protection' in the subject and explicitly specifying your request.

Any information relating to processing of your personal data is detailed in the register of the Data Protection Officer of the CAJU.

## **7. Recourse to the European Data Protection Supervisor**

You have the right to submit a complaint at any time directly to the European Data Protection Supervisor:

Rue Wiertz 60 - MO 63

B-1047 Bruxelles Belgium

Tel: +32 2 283 19 00

Fax: +32 2 283 19 50

Email: [edps@edps.europa.eu](mailto:edps@edps.europa.eu)

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<sup>1</sup> Adopted on 16 December 2021 by the CAJU Governing Board, as part of the Omnibus Decision CAJU-GB-2021-12-16, by which the Decision of the Governing Board laying down internal rules concerning restrictions of certain rights of data subjects in relation to processing of personal data in the framework of the functioning of the Clean Sky 2 Joint Undertaking CS-GB-Writ proc 2020-02, are directly transferred and shall apply to CAJU.