



EUAM PRIVACY STATEMENT – DATA PROTECTION NOTICE

FOR THE PURPOSE OF PROCESSING PERSONAL DATA RELATED TO EVENTS AND MEETINGS ORGANISED BY THE EUROPEAN UNION ADVISORY MISSION IN UKRAINE

1. INTRODUCTION

THE PROTECTION OF YOUR PRIVACY INCLUDING YOUR PERSONAL DATA IS OF GREAT IMPORTANCE TO THE EUROPEAN UNION AND TO EUAM UKRAINE. WHEN PROCESSING PERSONAL DATA WE REFLECT THE PROVISIONS OF THE CHARTER ON FUNDAMENTAL RIGHTS OF THE EUROPEAN UNION, AND IN PARTICULAR ITS ARTICLE 8 ON DATA PROTECTION. THIS PRIVACY STATEMENT DESCRIBES HOW EUAM UKRAINE PROCESSES YOUR PERSONAL DATA FOR THE PURPOSE IT HAS BEEN COLLECTED AND WHAT RIGHTS YOU HAVE AS A DATA SUBJECT. YOUR PERSONAL DATA BY EUAM UKRAINE IS PROCESSED IN ACCORDANCE WITH THE PRINCIPLES AND PROVISIONS LAID DOWN IN THE PERTINENT LEGISLATION ON DATA PROTECTION, INCLUDING THE 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 COMMUNITY 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 THE PROVISIONS OF THE GENERAL DATA PROTECTION REGULATION (EU) 2016/679/ AND IN ACCORDANCE WITH THE CIVOPSCDR INSTRUCTION 12-2018 AND WITH THE EUAM UKRAINE SOP ON THE PROTECTION OF PERSONAL DATA.

ALL DATA OF A PERSONAL NATURE - NAMELY DATA THAT CAN IDENTIFY YOU DIRECTLY OR INDIRECTLY - WILL BE HANDLED FAIRLY AND LAWFULLY WITH THE NECESSARY CARE.

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

The purpose of the data processing activity is to ensure proper organisation and management of events and meetings related to implementation of the mission mandate in order to disseminate information among participants and to the public, enhance cooperation, networking, facilitate exchange fora. It is also intended to further contact participants.

“Events and meetings” include in house and external location workshops, conferences, seminars, expert meetings, trainings, visits (including study visits abroad) and other events or meetings organised by EUAM Ukraine and related to implementation of the Mission’s mandate.

The organisation of “events and meetings” includes the management of contact and mailings lists for invitations, handling of participation requests and feedbacks, the preparation and distribution of preparatory materials, meeting reports, news items and publications to the participants as well as travel arrangements, accommodations and the entry to the premises with access control.

3. DATA PROCESSED: What data do we process?

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

1. For “events and meetings”:
 - Identification and contact information, including name, position / title, profession, function / organization, contact details, gender
 - Information about transport and accommodation if foreseen: financial information and banking details for the purpose of reimbursement of travel expenses / allowances together with supporting documents (e.g. tickets).
2. For “events and meetings abroad”, in addition to the previous:
 - photo, issuing and expiring dates, document number, date and place of birth, nationality (copy of passport)
 - Ukrainian tax number;
 - copy of travelling tickets, hotel reservation, boarding passes
 - UAH bank details, which includes name, surname, bank account number, full address and post number (Financial Identification Form (FIF) or Certificate from the bank)
3. In addition, data are also collected during the event and processed for informing the public, promoting EUAM in communications and publications:

- photos, audio and video filming and web streaming of speakers, participants or organisers as well as feedback, surveys, reports and other information about the event
- biographies and CVs if applicable.

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

The Controller determining the purpose and the means of the processing activity is the CSDP Mission EUAM Ukraine. The EUAM Ukraine section responsible for managing the personal data processing is OPERATIONS under the supervision of the Head of Mission Antti Hartikainen.

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

1. The recipients of your personal data (defined under point 3. DATA PROCESSED, paragraphs 1 and 2), and only if the data is necessary in order to fulfil the task (strictly need-to-know basis), may be
 - Designated organising staff of EUAM Ukraine or other assigned EUAM Ukraine team members
 - EUAM Ukraine Security staff
 - External partners, contractors, service providers for the event
 - Event participants, including speakers, interpreters, technical staff if applicable
 - EUAM Ukraine staff at Finance unit and Human Resources Management Unit
 - External travel agency
2. The recipients of your personal data (defined under point 3. DATA PROCESSED, paragraph 3) may be
 - EUAM Ukraine intranet users (if data published on EUAM intranet)
 - General public (if data is made public on the internet, EUAM Ukraine website or social media platforms)

Upon request personal data is given for the purpose of internal ex-post financial control and for internal or external auditing.

The given information will not be communicated to third parties or transferred to a Third Country, except where necessary for the purposes outlined above.

6. ACCESS, RECTIFICATION, ERASURE OF THE 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, as well as to request the removal of your personal data, if collected unlawfully, which will be implemented within one month after the receipt of your request. If you have any queries concerning the processing of your personal data, you may address them to the functional mailbox: hoops.office@euam-ukraine.eu

7. LEGAL BASIS FOR THE PROCESSING OPERATION: On what grounds we collect your data?

- Council Decision 2014/486/CFSP, 22 July 2014, and its subsequent amendments, latest being Council Decision (CFSP) 2019/761
- Revised Operational Plan (doc 8250/19, dated 5 April 2019)
- Civilian Operations Commander Instruction 12/2018 on the SOP on Personal Data Protection
- EUAM SOP on Data Protection 2019-EUAM-1232

The processing personal data related to events/meetings organized by EUAM Ukraine is necessary for the performance of a tasks carried out when implementing the Mission's mandate.

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

Retention of data

Our aim is to keep your personal data not longer than necessary for the purposes we collect them. After the event or meeting, your personal data is kept as long as follow-up actions to the event/meeting are required.

Documents provided for EUAM Ukraine Finance and Human Resources Management Unit are stored and deleted according the relevant regulations of those EUAM Ukraine activities.

Personal data is related to event/meetings is stored electronically with other material of the project in concern, at the SharePoint and by EUAM Ukraine Project Management Unit. Personal data may, however, be part of contact list shared

internally among EUAM Ukraine for the purpose of promoting future EUAM Ukraine activities and disseminating information.

Personal data may be kept for information and historical, statistical or scientific purposes for a longer period including the publication on the EUAM Ukraine intranet or EUAM Ukraine website with appropriate safeguard in place.

Security of data

Appropriate technical and organisational measures are ensured

- *Electronic format*: the data will be stored on the servers that abide by the pertinent security rules. Personal data will be processed by assigned staff members. Files have authorised access. Measures are provided to prevent non-responsible entities from access, alteration, deletion and disclosure of data. General access to all collected personal data and all related information is only possible to the recipients with a User ID/Password.
- *Physical Files*: When not in use, physical copies of the collected personal data will be stored in a properly secured and locked storage container.
- to prevent any unauthorised person from gaining access to computer systems; any unauthorised reading, copying, alteration or removal of storage media; any unauthorised memory inputs; any unauthorised disclosure, alteration or erasure of stored personal data; unauthorised persons from using data-processing systems by means of data transmission facilities;
- to ensure that authorised users of a data-processing system can access no personal data other than those to which their access right refers; the possibility to check logs; and that personal data being processed on behalf of third parties can be processed only on instruction of the controller; furthermore that, during communication or transport of personal data, the data cannot be read, copied or erased without authorisation;
- to record which personal data have been communicated, at what times and to whom.

9. MISSION DATA PROTECTION ADVISOR: Any questions to MDPA?

In case you have questions related to the protection of your personal data, you can also contact the Mission Data Protection Advisor (MDPA) – Legal Adviser - at the functional mailbox of the mission data.protection@euam-ukraine.eu

10. RECOURSE

You have at any time the right of recourse that you may send to the Head of the Mission within EUAM Ukraine, with the MDPA (Legal Adviser) in copy.