



EUAM UKRAINE PRIVACY STATEMENT – DATA PROTECTION NOTICE

FOR THE PURPOSE OF

PROCESSING PERSONAL DATA RELATED TO

IT AND NETWORK SERVICES

IN 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 CIVOPS/CDR 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?

To ensure the proper and secure technical functioning of information technology systems, information systems, and network systems and related services of EUAM Ukraine.

3. DATA PROCESSED: What data do we process?

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

1. Unique device identifier(s) (e.g. MAC address)
2. IP address(es) of devices, services and sites communicating with EUAM Ukraine CIS systems and services
3. Device name or alias
4. Mission account username
5. Network and system activity logs generated
6. Files stored on CIS facilities
7. Communication created/sent/received/saved in CIS collaboration services (e.g. email, Skype-for-Business)
8. Information submitted to and stored in EUAM Ukraine information systems

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 COMMUNICATIONS AND INFORMATION SYSTEMS (CIS) UNIT under the supervision of the Head of Mission Antti Hartikainen.

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

The recipients of your data may be:

Authorized and assigned CIS Unit staff with scope of access limited based on the principle of least privilege and need to know.

Upon request the information including personal data is given to auditors for auditing purposes and for internal / external specialist for technical assessment or in case of performing system maintenance.

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

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: Info.CIS@euam-ukraine.eu

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

Legal basis:

- Council Decision 2014/486/CFSP, 22 July 2014, and its subsequent amendments, latest being Council Decision 2019/761/CFSP, 13 May 2019
- 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
- EUAM SOP on Communication and Information Systems (CIS) 2016-EUAM-1051

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

Retention of data:

Personal data is kept for a maximum period determined by the type of network device or system. Depending on the capacity to retain historical data, network equipment may store connectivity logs for up to 12 months. The user mailbox is online/accessible during the employment of the Mission Member, and is indefinitely archived upon End of Mission.

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 accessing data. General access to all collected personal data and all related information is only possible to the recipients with a User ID/Password.
- 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.