

RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

according to Article 31 of [Regulation \(EU\) 2018/1725](#)



Personal data processing in the context of EFSA staff missions

DP/GOV/5

1) Controller(s)¹ of data processing activity (Article 31.1(a))

EFSA unit in charge of the processing activity: Head of Corporate Services Unit (CORSER)

EFSA Data Protection Officer (DPO): DataProtectionOfficer@efsa.europa.eu

Is EFSA a co-controller? **No**

If yes, indicate who is EFSA's co-controller:

With respect to the management of staff missions, the PMO having exclusive competence in the area of payments and reimbursements and also system owner of MIPS+ acts as a separate controller. The PMO can be contacted writing to PMO-MIPS@ec.europa.eu.

2) Who is actually conducting the processing? (Article 31.1(a))

The data is processed by EFSA itself ☐

Indicate the EFSA units or teams involved in the data processing:

The processing operation is conducted together with an external party ☒

Please provide below details on the external involvement:

The following services act as processors of EFSA on the basis of a procurement contract:

- Travel agency – Frigerio Viaggi Srl. (I)
- Travel risk management services – International SOS Srl. (B)
- Shuttle Service – AMNE Scarl. (I)

3) Purpose of the processing (Article 31.1(b))

The purpose of the personal data processing is to organize missions (travels away from the place of employment in the interest of the service) and authorised travels and the payment and/or reimbursement of related costs. In this respect, categories of data subjects are EFSA staff (officials, temporary and contract agents, seconded national experts, and on a case-by-case basis also trainees).

In the management of staff missions, EFSA relies on the European Commission Pay Master Office (PMO), owner and manager of the online tool MIPS+ ('Mission Processing System') and on external service providers. The mission management is broken down into internal operations carried out by PMO and EFSA and other operations carried out by contractors

¹ The controller decides on the purposes and means of the data processing. In case of joint controllership (e.g. systems of the European Commission applied by EFSA or jointly with another agency), EFSA is a co-controller.

selected following procurement procedures (travel agency services, mission assistance, incl. travel risk management services and insurance).

4) Legal basis and lawfulness of the processing (Article 5(a)–(d)):

Processing necessary for:

- (a) a task carried out in the public interest or in the exercise of official authority vested in EFSA ☒
- (b) compliance with a legal obligation to which EFSA is subject ☐
- (c) performance of a contract with the data subject or to prepare such contract ☐
- (d) The data subject has given consent (ex ante, explicit, informed) ☐

Further details on the legal basis:

- ✓ The Staff Regulations (SR), i.e., Annex VII to the SR, Art.11-13;
- ✓ The decision of the Management Board of 21 June 2018 on the adoption by analogy of the Commission Decision on the general provisions for implementing Articles 11, 12 and 13 of Annex VII to the Staff Regulations of Officials (mission expenses) and on authorised travel;
- ✓ The legal basis for processing personal data related to missions by the PMO can be found in the Commission Decision of 6 November 2002 establishing the Office for the Administration and Payment of Individual Entitlements C(2002)4367.

The processing of special categories of personal data referred to under point 6 b) is lawful as the conditions of Article 10(2)(b) of the EUDPR are met, namely the processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller of the data subject in the field of employment and social security and social protection law insofar as it is authorised by Union law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.

5) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are processed?

- EFSA statutory staff ☒
- Other individuals working for EFSA (consultants, trainees, interims, experts) ☒
- Stakeholders of EFSA, including Member State representatives ☐
- Contractors of EFSA providing goods and services ☒
- The general public, including visitors, correspondents, enquirers ☐
- Relatives of the data subject ☐

Other categories of data subjects (please detail below)

☐

Further details concerning the data subjects whose data are processed:

- EFSA staff (officials, temporary and contract agents, seconded national experts, and on a case-by-case basis also trainees);
- The different service providers (Travel agency; Travel risk management services; Shuttle Service).

6) Type of personal data processed (Article 31.1(c))

a) General personal data

The personal data concerns:

Name, contact details and affiliation	<input checked="" type="checkbox"/>
Details on education, expertise, profession of the person	<input type="checkbox"/>
Curriculum vitae	<input type="checkbox"/>
Financial details	<input checked="" type="checkbox"/>
Family, lifestyle and social circumstances	<input type="checkbox"/>
Goods and services the person provides	<input checked="" type="checkbox"/>
Other personal data (please detail):	<input checked="" type="checkbox"/>

b) Sensitive personal data (Article 10)

The personal data reveals:

Racial or ethnic origin of the person	<input type="checkbox"/>
Political opinions or trade union membership	<input type="checkbox"/>
Religious or philosophical beliefs	<input type="checkbox"/>
Health data or genetic or biometric data	<input checked="" type="checkbox"/>
Information regarding the person's sex life or sexual orientation	<input type="checkbox"/>

Further details concerning the personal data processed:

(a) General personal data on the Person Going on Mission (PGM):

Full name, date of birth, personnel number, business telephone number, business email address, location(s) of mission and transit, the scheduled departure and return time, the means of transport used, the name of the hotel, the start and end time of professional commitments at the mission locations, the PGM's bank account number, the budget line to which the mission will be charged, the MIPS mission number and the confirmation number generated at time of signature for the approval of the authorising

officer, invoices with confirmation/info on meals offered by the meeting host, local transport bills if eligible;

Additional information incl. leave or teleworking linked to the mission, advance payment request, attachments (e.g. meeting invitation & agenda), additional comments by the PGM;

Other optional data provided by the PGM in order to receive a more personalized service, in particular through their traveller profile (travel agency management tool containing information necessary and/or useful for processing orders and formatted and/or structured by them): mobile phone number, nationality, place of issue and expiry date of the passport, passport number, credit card, contact details of the person who can be called upon to make reservations for the project manager and any preferences in terms of travel conditions, seat and meal.

(b) Special categories of PGM personal data:

In MIPS+, data relating to the state of health of the PGM may be processed. Data on a health problem affecting work-related travel may appear in MIPS if the PGM is authorised to make a certain travel arrangement and/or to use a certain means of transport (e.g. travel by business class) in derogation from the common rules. In that regard a comment must be added to the file on the basis of a certificate from the EFSA Medical Adviser, which must be uploaded in MIPS+. The medical certificate must indicate the method of travel/recommended means of transport and the date of validity, without however indicating the specific medical reason justifying the derogation.

Health data may be processed also in case of an accident or sickness occurring during the PGM travelling and mission. Service providers of EFSA, incl. for risk management services indicated under point 3 may be involved in the data processing.

(c) Personal data in Microsoft Power BI financial reporting based on MIPS+:

In comprehensive dashboards, estimates and overviews of EFSA missions budget consumption and availability are provided. Some of the Power BI dashboard reports contain personal data: name and job position of the PGM (data subject) concerned, date, title, duration and destination of the mission. In such case, access rights to the Power BI reporting are restricted on a need-to-know basis.

7) Recipients of the data (Article 31.1(d))

Line managers of the data subject	X
Designated EFSA staff members	X
Other recipients (<i>please specify</i>):	X

(a) Recipients inside EFSA:

Designated EFSA staff: a restricted number of EFSA staff who are internally in charge of missions management and financial reporting, including the CORSER Unit assuming the Local Mission Officer function (LMO), Finance Unit, the EFSA Service Desk, providing system support, the authorising officer and Head of Department of the PGM, respective

Head of operational departments and of Units and their secretaries, assistants and department coordinators, respective Team Leaders, Executive Director office.

(b) Recipients outside EFSA:

Within the EU administration:

The European Commission's PMO staff in charge of missions and related reimbursements, members of other units of the PMO and the Commission in charge of monitoring and maintenance for system support, i.e. MIPS+, handling of legal issues and internal control.

EU control and audit bodies: IAS, IAC, OLAF, European Ombudsman, EDPS, CJEU.

Service providers/contractors of EFSA:

EFSA's travel agency: Order Forms for pre-paid travel tickets are exchanged electronically with EFSA's travel agency. In addition, periodical invoices are exchanged electronically between EFSA and the travel agency. To arrange travel bookings, the travel agency is entitled to make onward transfers of extracts of personal data contained in the pre-paid Order Form to airline companies. Furthermore, in case additional services are exceptionally requested, the travel agency is entitled to make onward transfers of extracts of personal data contained in the pre-paid Order Form.

Travel risk management services: (International SOS Srl.) As part of the service provision, the contractor offers a 'Tracker' tool, receiving from EFSA's travel agency data related to persons going on mission for EFSA. The purpose is to locate EFSA staff on mission/travellers in exceptional cases for security reasons or in case of an accident. As an optional service to users/travellers, they also have the possibility to download ISOS app on their mobile phone, which is not mandatory, but a personal choice.

Shuttle service: The external provider books on behalf of EFSA Units the shuttle service for staff on mission. This service is directly paid for by the Finance Unit through a monthly invoice.

8) Transfers to recipients outside the EEA (Article 31.1 (e))

Data are transferred to third country recipients:

Yes ☒ No ☐

If yes, specify to which third country:

If yes, specify under which safeguards:

Adequacy Decision of the European Commission ☐

Standard Contractual Clauses ☐

Binding Corporate Rules ☐

Memorandum of Understanding between public authorities ☐

On a case-by-case basis, transfers outside the EEA can occur as EFSA provides the travel agency and the shuttle service with the PGM's details (full name, title, work email) and the

date of birth to comply with the national and international laws applicable to travels and air carriers. These can be located outside the EEA depending on the place of the mission.

9) Technical and organisational security measures (Article 31.1(g))

How is the data stored?

- | | |
|--|-------------------------------------|
| On EFSA's Document Management System (DMS) | <input checked="" type="checkbox"/> |
| On a shared EFSA network drive or in an Outlook folder | <input type="checkbox"/> |
| In a paper file | <input type="checkbox"/> |
| Using a cloud computing solution (please detail the service provider and main characteristics of the cloud solution, e.g. public, private) | <input checked="" type="checkbox"/> |
| On servers of an external service provider | <input type="checkbox"/> |
| On servers of the European Commission or of another EU Institution | <input type="checkbox"/> |
| In another way (<i>please specify</i>): | <input checked="" type="checkbox"/> |

Please provide some general information on the security measures applied:

- The electronic mission workflow of EFSA is linked to a database where all relevant information is stored on the EFSA servers protected in accordance with the EFSA Security Policy. A filing system for Order Forms, invoices as well as reimbursement documents related to EFSA staff is kept with Finance Unit in the ABAC system.
- With respect to the contractors providing travel-related services, the traveler profile (as far as available) and booking arrangements are contained in the contractor's database;
- For the exchange of information between EFSA and its contractors mainly electronic mail and internet are used.

10) Retention period (Article 4.1 (e))

The mission order and reimbursement data together with Order Forms for pre-paid tickets are stored in MIPS+ and in the accounting system ABAC in relation to the reimbursement. Invoices and related documents are kept for a period of five years after the budgetary discharge of EFSA as supporting documents in the sense of Article 75 of the Financial Regulation.

The Microsoft PowerBI financial reports generated in MIPS+ are stored in MIPS+ and also have a retention period of five years.

The content of the functional inbox used in the management with the travel agency is cleaned on a two-yearly basis and at any rate upon termination of the relevant service contract. The travel agency will delete all personal data collected upon contract termination.

11) Consultation with the Information Security Officer

Was the ISO consulted on the processing operation ?

Yes ☒ No ☐

If yes, please provide some details on the consultation with the ISO:

12) Information given to data subjects (Articles 15 and 16)

Has information been provided to data subjects on the way their data is processed including how they can exercise their rights (access, rectification, objection, data portability)? Usually this information is provided in a Privacy Statement, specifying the controller's contact details. As possible, please provide a link to the relevant Privacy Statement or a description.

- Information on the data processing on the occasion of EFSA staff going on mission is detailed in a Privacy statement available on DMS and the Intranet Portal.
- To know their personal data processed by EFSA and the contractors providing travel-related services and to exercise their rights laid down in the Regulation, EFSA staff and experts at any time can contact the CORSER Unit (mission@efsa.europa.eu)

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