

EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

1	Title of the processing activity	Complementary Sickness Insurance for Local Agents in EU Delegations - Reimbursement Request for Medical Expenses
2	Update of the record (last modification date)	15/09/2023
3	Register reference number	1344
4	<p>Identity and contact details of the Data Controller Joint Controller (if applicable) Data Processor (if applicable)</p>	<p>Description</p> <p>The Reimbursement of Medical Expenses claim (and Dental Care, Optical Cost and Physiotherapy) needs to be filled out and submitted by a local agent in order to ask for a reimbursement of Medical Expenses. The claim must be submitted with all the supporting documents and processed within the Delegation; and not sent to EEAS BA.HR.5.</p> <p>The process is as follows:</p> <p>preparation of the request by a single agent (operational/financial initiating agent) ('certified correct' endorsement). The initiating agent draws up a summary of the proposed reimbursement, including the main items of information needed for processing the reimbursement: names of local staff member and beneficiary, type of expense and amount of the reimbursement proposed;</p> <p>operational/financial verification by the Head of Administration (verifier's approval entered); sealing of the envelope containing the supporting documents;</p> <p>payment authorisation by the Head of Delegation ('passed for payment' endorsement) on the basis of the summary and of the reimbursement request form; the supporting documents, placed in a sealed envelope, may be checked if this is deemed necessary;</p> <p>payment made on the basis of the summary;</p> <p>filing of reimbursement requests and supporting documents in a secure, locked file cupboards.</p> <p>In order to safeguard the confidentiality of the medical data, the member of local staff may exceptionally forward in person the medical report to the CSISLA functional mailbox. In such case, the local agent will have to inform the Administration of the Delegation.</p> <p>In order to guarantee confidentiality at Headquarters' level by limiting circulation of the files to the CSISLA, requests and supporting documents requiring headquarters' prior authorisation must only be sent to the functional mailbox LOCAL-AGENTS-CSISLA@eeas.europa.eu . The use of SECEM is recommended.</p> <p>The files are kept in HQ, in a locked room, in locked cupboards. Confidentiality declaration by all staff members has to be signed</p>

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		<p>The Reimbursement of Medical Expenses claim (and Dental Care, Optical Cost and Physiotherapy) needs to be filled out and submitted by a local agent, then submitted to the Head of Administration. The data is collected by the Head of Administration and the Head of the Delegation. The claim must be submitted with all the supporting documents. The claim is filled out by the local agent and then submitted to the Head of Administration. Comments:</p> <p>1/</p> <p>To be noted: any such disclosure or unauthorised use by an official or contractual agent constitutes a failure to comply with the obligations laid down in Article 17 of the Staff Regulations and is liable to lead to disciplinary proceedings under Title VI of the Staff Regulations. Such an act by a local staff member constitutes serious misconduct within the meaning of Article 20 of the Framework Rules and Chapter IX of the Specific Conditions of Employment, without prejudice to the relevant provisions of national legislation.</p> <p>In order to safeguard the confidentiality of medical data, it is necessary to reduce to the strict minimum the number of people required to handle the reimbursement of local staff members' medical expenses in accordance with article 66 of the FR and article 49 of the RAP.</p> <p>2/</p> <p>To be noted that the present data protection notification is a model notification. Model notifications are used when there are similar processing operations in several divisions, directorates, or in this case, in EU Delegations. It means that there will be only one notification covering the same process for all EU Delegations. There is a central management of the present procedure and data processing determined by the relevant division of the EEAS. Therefore, with regard to the personal data processing operation, the controller is the division in HQ, who is responsible for determining the purpose and the means of the procedure, defined under point 2 of the data protection notification. Although the Data Controller for the Model Notification is the organisational entity specified under point 2 of this notification, each Delegation under the supervision of the Head of Delegation will be the co-controller responsible for processing personal data in compliance with the provisions of Regulation (EC) 45/2001.</p>
5	Identity and contact details of the Data Protection Officer	<p>EEAS Data Protection Officer (DPO): Emese Savoia-Keleti. SG.AFFGEN.DPO Functional Mailbox of the DPO: DATA-PROTECTION@eeas.europa.eu</p>
6	Purpose of the processing activity	<p>The main purpose of the data processing operation is to, on the basis of documentary evidence of expenditure actually incurred, for members of local staff, apply for a reimbursement of the costs of consultations, home visits, pharmaceutical products, examinations and any other form of treatment specified in the CSISLA regulation, on a claim form, which might be sent to the Head of Administration. The present processing operation also includes the reimbursement of Dental Care, Optical Cost and Physiotherapy and can also include depend relatives.</p>

7	Legal basis and lawfulness	<p>Legal Basis at stake:</p> <p>Article 14 of the CSISLA* regulation</p> <p>Articles 10 and 11 of the CSISLA* regulation</p> <p>Article 8 of the CSISLA* regulation</p> <p>Article 17 and Title VI of the Staff Regulations</p> <p>Article 20 of the Framework rules laying down the conditions of employment of local staff of the Commission of the European Communities serving in non-member countries</p> <p>Article 66 of the Financial Regulation (FR) and article 49 of the Rules of Application (RAP) of 2012 applicable to the general budget of the European Union</p> <p>*Complementary Sickness Insurance Scheme for Local Agents (CSISLA)</p> <p>Link on intranet/EEAS zone: http://intragate.ec.europa.eu/eeas/eeaszone/?q=node/28121</p> <p>Further legal reference:</p> <p>Good administrative practices in the framework of the Treaty of Lisbon and 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</p>
8	Categories of individuals whose data is processed - Data subjects	<p>Data are processed from the following individuals or group of people:</p> <p>Local staff in EU delegations</p> <p>Their eligible dependants</p> <p>Doctors and practitioners who have treated the applicant</p>

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9	Categories of data - Data processed	<p>Data, including personal data processed are the following: - PersonalData (name, forename, address, data of birth, local agent pers. number) of local staff in EU delegation - Personal Data (name, forename, address, data of birth, local agent pers. number) of eligible dependant - Medical report (treatment, foreseen treatment, plaster model, complete diagnosis, health conditions, X-rays, medical practitioner's prescription), in particular in case of prior authorisation requests - Credentials of the practitioners</p>
10	Recipients of data – Access to data	<p>In EU Delegations: assigned staff, case handlers, the Head of Administration, the Head of Delegation</p> <p>In HQ: Assigned staff, case handlers of EEAS BA HR 5 Division for Local Agents, Head of Division, Head of Sector, and in verification cases subcontractors (medical or dental consultants) active for EEAS BA HR 5</p>
11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	<p>Potential transfer to the Primary Insurance Company, with whom the local agent has the primary insurance coverage in the relevant third country.</p>
12	Time limit for keeping the data - Retention period	<p>Medical records are to be kept for 30 years after the termination of duties of the person concerned in accordance with the Common Commission-Level Retention list Management Schedule – Annex I. Point 12.3.10 .</p> <p>Payment related financial documents are to be kept for the periods determined under the Financial Regulation as justification for the payment (5 + 2 years due to budgetary discharge);</p> <p>Other data in supporting documents are to be kept for 5 years for control, inspection and audit purposes.</p> <p>When appropriate – in accordance with Article 48(3) of the Rules of Application of the Financial Regulation, personal data contained in supporting documents should be deleted where possible where these data are not necessary for budgetary discharge, control and audit purposes.</p>

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<p>13</p>	<p>Data Storage</p>	<p>In HQ The files are kept in a locked room in a locked cupboard, only the staff dealing with CSISLA has access to this room.</p> <p>In EU Delegations:</p> <p>The files are kept in the Administration Section (usually Head of Administration Office), in a locked room. Only the assigned staff dealing with medical reimbursements has access to this files.</p> <p>Claims are not submitted by IT means, but manually in a sealed envelope addressed to the Head of Administration</p> <p>Storage of the claims is in locked cupboards.</p> <p>In order to safeguard the confidentiality, the request for reimbursement (request form + supporting documents) has to be lodged in a sealed envelope addressed to the Head of Administration and marked 'Medical Matter'</p>
<p>14</p>	<p>General description of security measures</p>	<p>Requests are forwarded through the Delegation's administration. The cover note or message must not contain any reference of a medical nature.</p> <p>Exceptionally, and in order to safeguard the confidentiality of the medical data, the local staff member may, if he so wishes, forward in person the documents containing medical data to the functional mailbox. In such case, the local agent will have to inform the Delegation's administration section. Notes in response to requests for prior authorisation are normally sent only to the Head of Delegation and/or to the Head of Administration so as to limit their circulation within the Delegation. They do not contain references of a medical nature. It is then up to the Head of Administration to inform the local staff member of the decision.</p> <p>In order to safeguard the confidentiality, the request for reimbursement (request form + supporting documents) has to be lodged in a sealed envelope addressed to the Head of Administration and marked 'Medical Matter'</p> <p>In order to guarantee confidentiality at Headquarters' level by limiting circulation of the files to the CSISLA, requests and supporting documents requiring headquarters' prior authorisation must only be sent to functional mailbox LOCAL-AGENTS-CSISLA@eeas.europa.eu . The use of SECEM is recommended</p> <p>In line with HQ instructions and in order to safeguard the confidentiality of medical data, the number of people handling the reimbursement of local staff members' medical expenses is reduced to the strict minimum. A confidentiality declaration should be signed by staff members involved in the process and the signed document should be kept by the EU Delegation.</p>

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15	Rights of individuals	<p>Data subjects have the right to access their personal data and the right to correct any inaccurate or incomplete personal data, as well as to request the removal of unlawful personal data, which will be implemented within 10 working days after the request will have been deemed legitimate. If the data subject has any queries concerning the processing of his/her personal data, s/he may address them to the data controller at the following functional mailbox:</p> <p>LOCAL-AGENTS-CSISLA@eeas.europa.eu ; LOCAL-AGENTS@eeas.europa.eu</p>
16	Information to data subjects	<p>A Privacy Statement linked to this Notification contains all information provided to the Data Subject(s).</p> <p>The aforementioned Privacy Statement is available on the intranet EEASzone: ADMINISTRATION HUMAN RESOURCES LOCAL AGENTS CSISLA: http://intragate.ec.europa.eu/eeas/eeaszone/?q=node/28121 and on the EU Delegations' Guide: HUMAN RESOURCES LOCAL AGENTS CSISLA: http://intragate.ec.europa.eu/admcorner/eudelguide/policy.cfm?pid=259</p>