EEAS Personal Data Processing Record

1	Title of the processing activity	**Travel form related to non-EU staff travelling in EU vehicles - Travel Clearance**
2	Update of the record (last modification date)	04/01/2024
3	Register reference number	2901
4	Identity and contact details of the Data Controller Joint Controller (if applicable) Data Processor (if applicable)	European External Action Service Rond Point Schuman 9A, 1046 Brussels, Belgium Data Controller contact entity: SG.CRC.3, Field Security Functional mailbox: sg-crc-3@eeas.europa.eu
5	Identity and contact details of the Data Protection Officer	EEAS Data Protection Officer (DPO): Emese Savoia-Keleti. SG.AFFGEN.DPO Functional Mailbox of the DPO: DATA-PROTECTION@eeas.europa.eu
6	Purpose of the processing activity	Purpose(s): The purpose of the processing is to manage data of individuals other than EU staff when travelling in EU vehicles in third countries. It is necessary to control internally who uses EU vehicles and to determine the duty of care in case of a car accident. Description: General travel forms are established and given to individuals or sent by e-mail other than EU staff travelling in EU vehicles. Hard copies are to be printed out by staff of the EU Delegation, and a copy is handed over to the driver prior to any transport. After the travel takes place, hard copies are collected and kept in locked cupboards. The General Travel forms are prepared only for internal purposes. Each passenger will have to travel with his/her own documents/identification in case there are controls by local authorities in the third country. This template will only be used to control internally who uses EU vehicles and to determine the Duty of care in case a car accident reaches the courts.
7	Legal basis and lawfulness	Lawfulness: The processing of personal data is necessary for the performance of a task carried out by the European External Action Service in the public interest, in particular for the management and functioning of the EEAS [Article 5(1)(a) of Regulation (EU) 2018/1725] as referred to in Recital 22 thereof. Legal basis: Decision of the High Representative of the Union for Foreign Affairs and Security Policy of 19 September 2017 on the security rules for the European External Action Service - ADMIN(2017) 10: Article 3 on the duty of care obligation. Further legal reference: Council Decision of 26 July 2010 establishing the organisation and functioning of the EEAS (2010/427/EU) – OJ L 201, 3/8/2010, p. 30.
8	Categories of individuals whose data is processed - Data subjects	Individuals other than EU staff when travelling in EU vehicles, including third parties (partner organisations, NGOs).

9	Categories of data - Data processed	First Name/Last Name Nationality Passport number Organisation
10	Recipients of data – Access to data	Head of Delegation and other members of the Security Management Team (Regional Security Advisor/Officer, etc.) Drivers and passengers of the vehicles
11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	N/A
12	Time limit for keeping the data - Retention period	1 year, except for any case of investigation when data that is stored in the information form needs to be kept longer linked to an incident. General Travel forms will be stored 1 year in the shared drive of the EU Delegation and in a locked cupboard, except if there is an incident and an investigation is ongoing. In that case, the storage period would be extended until investigations are closed. Personal data may be kept for information and historical, statistical or scientific purposes for a longer period of time including the publication on the EEAS/EU Delegation website and on the EEAS Intranet with appropriate safeguards in place. Archiving shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of individuals. Reports and other material containing personal data are archived according to e -Domec policy. In case of an incident, event or enquiry by authorities, data subjects or other concerned individuals' personal data will be preserved as long as the legal claims arising from the investigations expire or any follow-up action is due. This includes pending cases, appeals and court judgments t o allow for the exhaustion of all appeal and other channels of legal remedies. In any case, p ersonal data will not be kept longer than 5 years after the judgment on the pending case is final. When appropriate, personal data contained in supporting documents should be deleted where possible, if that data is not necessary for audit, inspection or other control purpose
13	Data Storage	Each EU Delegation will store the General Travel forms electronically on the Delegation drive and in paper form. EU Delegations will destroy the forms once the period of one year is over.
14	General description of security measures	Physical copies of personal data are stored in a properly secured manner General travel forms are sent via secure e-mail, forms collected are stored in locked cupboards. Electronic versions are stored on drives with access protected by a userID and password. Hard copies are to be printed out by staff of the EU Delegation, and a copy is handed over to the driver prior to any transport. After the travel takes place, hard copies are collected and kept in locked cupboards.
15	Rights of individuals	Data subjects have to contact the Delegation whose vehicle they travel with in case of questions or complaints.

16	Information to data subjects	Individuals will be informed during collection of data, as they will have to complete and sign the form in which they are informed about data protection provisions applied in the processing of personal data. A Privacy statement will be attached.