

EEAS Personal Data Processing Record

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

1	Title of the processing activity	Accreditation of the members of Diplomatic Corps
2	Update of the record (last modification date)	04/01/2024
3	Register reference number	3041
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: EEAS.SG.3 - Protocol Functional mailbox: PROTOCOL-ACCREDITATION@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	The purpose of the present processing activity is to enable the accreditation of diplomatic agents to the European Union, including Heads of Diplomatic Missions of Third Countries and Heads of Representations of International Organisations. Personal data of heads and other members of the diplomatic missions accredited to the European Union, as well as the heads of the liaison offices of the international organisations accredited to the European Union and their deputies are collected for accreditation, notification and communication purposes including necessary verifications where applicable.

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7	Legal basis and lawfulness	<p>Lawfulness</p> <p>The processing of your personal data is necessary for the performance of a task carried out by the EEAS in the public interest, in particular for the management and functioning of the European External Action Service, specifically for the purpose of accreditation and notification of diplomatic staff [Article 5(1)(a) of Regulation (EU) 1725/2018] as referred to in Recital 22 thereof.</p> <p>Legal Basis</p> <p>The legal basis of the processing are Article 04 and 10 of the Vienna Convention on Diplomatic Relations of 1961 and established diplomatic customs and practices followed by states and international organisations in international relations.</p> <p>Further legal reference: Note proposing the reattribution of lead service function in two areas of external relations Ares(2021)2496518</p> <p>Ares(2021)5342554 Transfer of internal market files in relation to the non EU Western European states to the Commission</p> <p>Ares(2021)5607239 [Re] Transfer of internal market files in relation to the non EU Western European states to the Commission</p> <p>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.</p>
8	Categories of individuals whose data is processed - Data subjects	<p>Heads of diplomatic missions accredited to the European Union Members of staff of diplomatic missions accredited to the European Union Heads of the liaison offices of international organisations accredited to the European Union Deputy heads of liaison offices of international organisations accredited to the European Union</p>

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9	Categories of data - Data processed	<p>The data, including personal data, which may be processed for that purpose are the following:</p> <ul style="list-style-type: none"> Name of the member of the diplomatic mission or international organisation office Name of the diplomatic mission or IO office Function, diplomatic title Date of the notification of arrival and termination of duties; Date and place of birth and patronym (where applicable) Name of the Spouse (where applicable) ID photo
10	Recipients of data – Access to data	<p>Access to the data is provided to authorised EEAS' staff of the Protocol Division (SG.3) according to the "need-to-know" principle. Such staff abide by statutory, and when required, additional confidentiality obligations.</p> <p>The Division responsible for HQ Security and EEAS Security Policy (EEAS.RM.SECRE.2) for the purpose of security related verifications where applicable</p> <p>The Diplomatic List including Heads and Members of the Diplomatic Missions accredited to the EU as well as Heads of Liaison Offices of international organisations accredited to the European Union is published on the website of the European External Action Service (EEAS)</p>
11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	N/A

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<p>12</p>	<p>Time limit for keeping the data - Retention period</p>	<p>Storage period</p> <p>Personal data are kept for as long as it is necessary to fulfil the purpose of collection and processing required for the accreditation and notification, for a maximum period of 10 years from the date of the communication by the diplomatic mission or liaison office, taking into account, among others, the purposes listed below. The electronic directory/database is continuously updated. Obsolete data (no longer up-to-date) are deleted.</p> <p>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 the -Domec policy.</p> <p>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 to allow for the exhaustion of all appeal and other channels of legal remedies. In any case, personal data will not be kept longer than 5 years after the judgment on the pending case is final.</p> <p>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 purposes.</p>
<p>13</p>	<p>Data Storage</p>	<p>The data is stored as follows:</p> <ul style="list-style-type: none"> Paper Electronic files on computers and servers Databases

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14	General description of security measures	<p>Specific security measures</p> <p>The data will be stored on the secured drive of the EEAS Protocol Division , hence meets EEAS' security standards or on EC DIGIT infrastructure that has been approved by EEAS Digital Solution and that meets their security requirements. Thereby, measures are in place to:</p> <p>aim for using privacy-enhancing technologies (PETs);</p> <p>ensure confidentiality, integrity availability and resilience of processing systems and services;</p> <p>restore availability and access to personal data in a timely manner in the event of physical or technical incident.</p> <p>An information security policy is in place in specific areas and steps to make sure the policy is implemented and the controls to enforce them.</p>
15	Rights of individuals	<p>Data subjects have the right of access to their personal data and the right to correct any inaccurate or incomplete personal data. The right of rectification can only apply to factual data processed. Under certain conditions, data subjects have the right to ask the deletion of their personal data or restrict their use as well as to object at any time to the processing of their personal data on grounds relating to their particular situation.</p> <p>The EEAS will consider the request, take a decision and communicate it to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary. Data subjects are informed in the Privacy Statement that they can find more information in Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725.</p> <p>In specific cases, restrictions under Article 25 of the Regulation may apply. If data subjects have questions concerning the processing of their personal data, they may address them to the Data Controller via the functional mailbox:</p> <p>PROTOCOL-ACCREDITATION@eeas.europa.eu PROTOCOL-NOTIFICATION@eeas.europa.eu</p>
16	Information to data subjects	<p>A specific Privacy Statement is available for data subjects on the internet.</p> <p>The Privacy Statement is also attached to related communication.</p>

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