

EEAS Personal Data Processing Record

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

1	Title of the processing activity	Real Estate Management by the EEAS/EU Delegations via 'IMMOGEST' application
2	Update of the record (last modification date)	04/01/2024
3	Register reference number	3101
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 Division Real Estate, Safety and Greening in Delegations - RM.SCS.6
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	<p>Purpose(s) The purpose of the present processing activity is to manage EEAS owned or rented buildings in EU Delegations.</p> <p>Description Immogest may contain personal data related to the occupancy of an accommodation. Personal data related to EEAS or Commission staff (as tenants) and to property-owners of the rented property (as lessors) may be stored in the system. With regard to the 'property owner' category – data are contained in the copy of the contract that is uploaded in the system.</p>
7	Legal basis and lawfulness	<p>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.</p> <p>Legal reference HR DEC 2013 011 Decision of the High Representative of the Union for Foreign Affairs and Security Policy of 17/12/2013 regarding the rules for the implementation of housing policy in EU Delegations https://intranet.eeas.europa.eu/system/files/inline-files/HR_DEC%282013%29_011.pdf 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>I. EEAS or Commission Staff</p> <p>II. Property-owners or contact persons if property owners are organisations</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> <p>I. EEAS or Commission Staff</p> <p>Name, Surname Family composition Staff number Address in Delegation</p> <p>II. Property-owners and their contact persons</p> <p>Name, Surname Complete address Bank account Amount of the rent</p>
10	Recipients of data – Access to data	<p>The recipients of personal data may be:</p> <p>Assigned staff of 'Real Estate , Safety and Greening' (RM.SCS.6) Assigned staff of "Support to Delegations" (RM.BHR.6) Assigned staff of the relevant EU Delegation Assigned staff of the EU institutions dealing with monitoring, control and audit tasks or involved in the discharge process (including the Court of Auditors, the European Parliament and the Council)</p> <p>Personal data is not intended to be transferred to a third country or an international organisation, except where necessary for providing access as described above. In case of international transfers appropriate safeguards are ensured in accordance with Chapter V of Regulation (EU) 2018/1725. The given information will not be communicated to third parties, except where necessary for the purposes outlined above.</p>
11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	N/A

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12	Time limit for keeping the data - Retention period	<p>In accordance with the budgetary rules** personal data will be retained for the duration of posting (up to 6 years for Contract Agents), while for operations (i.e. lease contracts) not closed, data will be archived and kept for 5 years after the end of the year following that in which the operations are closed. Where possible, personal data contained will be deleted when those data are not necessary for budgetary discharge, control and audit purposes.</p> <p>** Article 75 of the FR (Financial Regulation: Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012)</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 e-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>
13	Data Storage	EEAS SERVER managed by the EEAS IT Division.
14	General description of security measures	Various profiles exist, limiting the access to data to what is strictly necessary.
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: RM-SCS-64@eeas.europa.eu</p>
16	Information to data subjects	<p>A specific Privacy Statement is available for data subjects on the internet and the link to it is displayed in the IMMOGEST system.</p> <p>The aforementioned Privacy Statement is available on the EEAS webpage and is attached to related communication.</p>

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