

## **DATA PROTECTION NOTICE**

### **EUAA Platform on Open-Source Intelligence in Asylum**

#### **1. Introduction**

The European Union Agency for Asylum (hereinafter ‘the EUAA’ or ‘the Agency’) is committed to protecting your privacy. The EUAA collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725 <sup>\(1\)</sup>](#) (hereinafter ‘the EUDPR’).

This Data Protection Notice explains, *inter alia*, the reasons for the processing of your personal data, the way we collect, handle and ensure protection of your personal data and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, as well as of the Data Protection Officer (DPO) and the European Data Protection Supervisor (EDPS) to which you may have recourse as well to exercise the said rights.

#### **2. Why and how do we process your personal data?**

Your personal data are processed for the purpose of managing the EUAA Platform on Open-source Intelligence in Asylum (hereinafter ‘the OSINT platform’ <sup>(2)</sup>). More specifically, information, including contact details, about officials in the Member States that will serve as members of the OSINT platform is collected through a nomination form in a word document that is maintained by the Asylum Processes Sector (APS) under the Asylum and Reception Cooperation and Guidance Unit (ARCGU) within the Asylum Knowledge Centre (C3) of the Agency on the restricted EUAA SharePoint website. This restricted SharePoint site is only accessible to persons who have been nominated to have access by their Member State authority (i.e., designated experts). Each Member State decides itself if it wishes to appoint one or several experts for the OSINT platform. However, Member States are invited to designate at least one expert for each of the following main tasks in connection with the OSINT platform specified in the table in the word document: disseminating information from the OSINT platform in the relevant Member State, query responder or proposer, and responding to other requests for information or input.

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<sup>(1)</sup> Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39-3

<sup>(2)</sup> This Platform was created to provide the possibility for national experts to exchange good practices and know-how and explore opportunities for sharing of dedicated tools. The Platform promotes practical cooperation activities with a view to improve and harmonise OSINT related asylum processes and functions under auspices of the EUAA Asylum Processes Network. The Platform should not be understood as a separate OSINT tool but the forum where members of it can engage in information sharing, consultation and practical cooperation activities on OSINT.

The data contained in the nomination form are updated upon changes communicated by the members of the platform themselves and/or the national contact points of the Asylum Processes Network. This form is stored on the Agency's internal document management system (ERDMS) and made available on the EUAA SharePoint site with restricted access. Member States will be reminded twice per year to validate/update the information provided in the table in the word document. Member States are also encouraged to provide information, upon their own initiative, on any changes in the contact points for the EUAA Working Group on the OSINT platform when such changes occur.

Your personal data will also be used to organise meetings, prepare meetings reports/minutes and circulate information needed for the work of the Working group. Some personal data will also be collected and processed to facilitate your attendance to working group meetings and other related events organised by EUAA such as for registration, invitation and reimbursement purposes.

In addition, and to the extent that you agree, your personal data will also be used to give you access to the corresponding MS Teams channel. For more information on the processing of personal data in the context of M365, please see the following [data protection notice](https://euaa.europa.eu/sites/default/files/2022-05/Data Protection Notice Processing of personal data in the context of M365.pdf).  
<https://euaa.europa.eu/sites/default/files/2022-05/Data Protection Notice Processing of personal data in the context of M365.pdf>.

### **3. On what legal ground(s) do we process your personal data?**

We process your personal data on the basis of Article 1(2) of [Regulation \(EU\) 2021/2303](#) <sup>(3)</sup> (hereinafter 'the EUAA Regulation') which reads as follows: *"The Agency shall contribute to ensuring the efficient and uniform application of Union law on asylum in the Member States in a manner that fully respects fundamental rights. The Agency shall facilitate and support the activities of the Member States in the implementation of the Common European Asylum System (CEAS), including by enabling convergence in the assessment of applications for international protection across the Union and by coordinating and strengthening practical cooperation and information exchange"*.

Moreover, by virtue of point (a) of Article 2(1) of the EUAA Regulation, *"[...] the Agency shall perform the following tasks: (a) facilitate, coordinate and strengthen practical cooperation and information exchange among Member States on their asylum and reception systems"*.

In addition, the Agency's duty to cooperate in good faith and exchange all information in a timely and accurate manner with the national authorities responsible for asylum and immigration and other relevant services is set out in Article 4(4) of the EUAA Regulation which reads as follows: *"The Agency shall organise, promote and coordinate activities enabling the exchange of information among Member States, including through the establishment of networks, as appropriate"*.

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<sup>(3)</sup> Regulation (EU) 2021/2303 of the European Parliament and of the Council of 15 December 2021 on the European Union Agency for Asylum and repealing Regulation (EU) No 439/2010, OJ L 468, 30.12.2021, p. 1-54.



Consequently, the processing operation is lawful under Article 5(1) point (a) of the EUDPR given that it is necessary for the performance of the tasks that the Agency has been vested with by virtue of its mandate.

#### **4. Which personal data do we collect and further process?**

The following categories of your personal data may be processed under the word document tab dedicated to the relevant Member State:

Name/surname, title/job description and work e-mail address.

Additionally, the following categories of personal data may be collected in relation to attendance to meetings and other events organised within the OSINT platform by EUAA:

- Indication of whether attendance at the meeting or other event will be remote or in-person;
- Dietary requirements if meals are provided;
- Photos and/or audio-video recordings;
- Personal data in meeting agendas, transcripts, notes, minutes, reports, presentations, .;
- Personal data related to travel and/or accommodation arrangements, such as personal data contained in passports, flight tickets or hotel reservations;
- Personal data related to bank account and other financial details (e.g., Legal Entity and Financial Identification Forms) for the reimbursement of travel and accommodation expenses and the payment of daily subsistence allowances.

#### **5. How long do we keep your personal data?**

Your personal data are accessible through the EUAA SharePoint site as described above and are stored in the internal document management system of the Agency (ERDMS). Given that the table is subject to regular updates from the moment a data subject is no longer a nominated expert the relevant data will no longer be visible in the said table. Your data will remain in the table throughout the duration of your involvement in the OSINT Platform. Personal data that may appear in reports and minutes will be retained for a period of 10 years following the completion of the work of the platform.

#### **6. How do we protect and safeguard your personal data?**

All personal data in electronic format (e-mails, documents, etc.) are stored on the servers of the EUAA. In order to protect your personal data, the EUAA has put in place a number of technical and organisational measures as required under Article 33 of the EUDPR. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.





For website security purposes and to ensure that the EUAA SharePoint site remains available to all users, network traffic is monitored to identify unauthorised attempts to exploit or change information on this website or otherwise cause damage or conduct criminal activity. Anyone using this website is advised that if such monitoring reveals evidence of possible abuse or criminal activity, results of such activity might be provided to the appropriate authorities in line with the applicable rules.

**7. Who has access to your personal data and to whom are they disclosed?**

The following (categories of) recipients have access to your personal data:

- EUAA personnel within the Asylum Processes Sector (APS);
- Other EUAA personnel, only on a need-to-know basis, including personnel of the Information Communications and Technology Unit (ICTU) for security related purposes;
- Designated experts by the respective Member State authorities to access the EUAA SharePoint site for the OSINT platform.

**8. Do we transfer any of your personal data to third countries or international organisations (outside the EU/EEA)?**

This processing activity does not entail any transfers of personal data to third countries or international organisations (outside the EU/EEA).

**9. Does this processing involve automated decision-making, including profiling?**

This processing activity does not involve automated decision-making, including profiling.

**10. What are your rights and how can you exercise them?**

According to the EUDPR, you are entitled to access your personal data and to rectify them in case the data are inaccurate or incomplete. If your personal data are no longer needed by the EUAA or if the processing operation is unlawful, you have the right to erase your data. Under certain circumstances, such as if you contest the accuracy of the processed data or if you are not sure if your data are lawfully processed, you may ask the Data Controller to restrict the data processing. You may also object, on compelling legitimate grounds, to the processing of data relating to you. Additionally, you have the right to data portability which allows you to obtain the data that the Data Controller holds on you and to transfer them from one Data Controller to another. Where relevant and technically feasible, the EUAA will do this work for you.

If you wish to exercise your rights, please contact the Data Controller, i.e. the Head of Asylum Processes Sector (APS), by sending an e-mail to [asylum.processes@euaa.europa.eu](mailto:asylum.processes@euaa.europa.eu).





You may always submit queries, remarks or complaints relating to the processing of your personal data to the Data Protection Officer (DPO) of the EUAA by using the following e-mail address: [dpo@euaa.europa.eu](mailto:dpo@euaa.europa.eu).

In case of conflict, complaints can be addressed to the European Data Protection Supervisor (EDPS) using the following e-mail address: [supervision@edps.europa.eu](mailto:supervision@edps.europa.eu) .

Endorsed: 29 November 2024

