



## DATA PROTECTION NOTICE

### for Member State Experts involved in training content design and development

#### 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?

In line with the principle of EU solidarity and its mandate, the EUAA draws from Member State Experts in the field who contribute to the design and development of its training and may also deliver some parts of the EUAA Training in subject areas specific to their expertise. In this context, the Experts are required to contribute to the development of ‘common’ European training material, reflecting EU standards and regulations. Your personal data is processed for the purpose of creating and maintaining a list of content experts and facilitate communication between you and EUAA during the implementation of the activities in relation to the update, upgrade and development of the EUAA training material.

Following your nomination submitted to the EUAA through the National Contact Point of your administration your data is collected by the responsible staff of the EUAA Training and Professional Development Centre. Your CV is then accessed by a selection panel composed of EUAA staff of the Training and Professional Development Centre that decides whether you are going to form part of a Content Expert Group. .

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

We process your personal data on the basis of Article 2(1)(d) of [Regulation \(EU\) 2021/2303](#)<sup>2</sup> (hereinafter ‘the EUAA Regulation’), which provides that the Agency shall “assist Member States as regards training and, where appropriate, provide training to Member States’ experts from all national

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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. 39-98.

<sup>2</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.





administrations, courts and tribunals, and national authorities responsible for asylum matters, including through the development of a European asylum curriculum”.

4. More specifically, Article 8 of the EUAA Regulation provides, inter alia, that the Agency “shall establish, develop and review training for members of its own staff and members of the staff of relevant administrations, courts and tribunals, and of national authorities responsible for asylum and reception”(see Article 8(1)) and “shall develop training [...] in close cooperation with Member States [...] (see Article 8(2))”. 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. **Which personal data do we collect and further process?**

The following (categories of) personal data may be processed:

- First name;
- Surname;
- Email address;
- Phone number;
- CV;
- Employing organisation and function/role;
- Comments you submit in the context of development of the training materials.

In addition to the above, your banking details are processed for reimbursement purposes.

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

Your comments (along with your full name) are stored throughout the life cycle of the Module’s version. Your CV will be deleted after the appointment to the Content Experts Group our contact details remain in a list used by EUAA as a contact list for an Expert Pool unless you/your national administration indicate that you no longer wish to be part of the Expert Pool.

#### 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. It is noted that the nominations per expert are stored in a sensitive folder in the Electronic Records and Document Management System ('ERDMS') of the Agency where access is limited only to the staff of Training Design and Development Sector.

#### 7. Who has access to your personal data and to whom is it disclosed?

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



The responsible staff of the EUAA Training and Professional Development Centre. Other Experts who are involved in the process of design and development of the EUAA training material have access to your full name and email addresses. Trainers of the European Asylum Curriculum have access to your full name.

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

In principle, no transfer of your personal data to third countries or international organisations (outside the EU/EUAA) will take place. To the extent that you may work on training materials that are to be reviewed by the United Nations High Commissioner for Refugees (UNHCR) <sup>3</sup>note that your name may appear in the drafts shared when there are divergent views. In these cases, your explicit consent shall be sought prior to the sharing of your name.

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

No.

**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., Tanja Contino, Head of the Asylum and Reception Training Unit by sending an e-mail to [tanja.contino@euaa.europa.eu](mailto:tanja.contino@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).

*Adopted: November 2025*

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<sup>3</sup> Note that the EUAA has in place a working arrangement with the UNHCR available here: [https://euaa.europa.eu/sites/default/files/2023-05/Updated\\_EASO-UNHCR\\_Working\\_Arrangement.pdf](https://euaa.europa.eu/sites/default/files/2023-05/Updated_EASO-UNHCR_Working_Arrangement.pdf)