



## **DATA PROTECTION NOTICE**

### **on the handling of the case sampling for the purposes of the monitoring mechanism**

#### **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 personal data, the way we collect, handle and ensure protection of personal data, and what rights you have in relation to this 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 personal data in relation to case sampling?**

According to Article 2(1)(q) of [Regulation \(EU\) 2021/2303](#)<sup>2</sup> (hereinafter the ‘EUAA Regulation’) the EUAA shall ‘monitor the operational and technical application of the CEAS with a view to assisting Member States to enhance the efficiency of their asylum and reception systems’. Pursuant to Article 14(4) of the EUAA Regulation the monitoring may be carried out, *inter alia*, on the basis of case sampling.

Case files are transmitted by the Member State competent authority/ies to the EUAA in accordance with section ‘6.2. Case sampling’ of the Monitoring Methodology<sup>3</sup>.

The EUAA uses the case files only in order to carry out analysis for the purposes of monitoring. The aim of the case sample analysis is to provide insight into how processes are implemented for specific types of administrative procedures or workflows. While the analysis is carried out by processing specific cases, it does not aim to identify the persons concerned and/or to reassess the individual facts of the case.

Member States are asked to ensure that case files shared with the EUAA are anonymised to the extent possible, while retaining only the data necessary for the relevant analysis of the case sample. Where a Member State cannot achieve the required level of anonymisation and data minimisation on its own,

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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, ELI: <http://data.europa.eu/eli/reg/2018/1725/oj>).

<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, ELI: <http://data.europa.eu/eli/reg/2021/2303/oj>).

<sup>3</sup> Management Board Decision No 198 of 16 June 2026 establishing the common methodology for the monitoring mechanism on the operational and technical application of the Common European Asylum System, available at <https://www.euaa.europa.eu/publications/management-board-decision-no-1982026-monitoring-methodology>.





the EUAA may provide support in that regard, including through a dedicated preparatory mission, where appropriate.

Member States are furthermore strongly encouraged to submit the selected case files to the EUAA translated in English, the working language of the Agency. Where this is not feasible, the EUAA shall arrange for translation, including through the European Commission's eTranslation tool<sup>4</sup>.

The monitoring report, including the findings, and the recommendations, drawn up in accordance with Article 15 of the EUAA Regulation, as well as the summary of the monitoring report, will not contain references to specific case files and personal data contained therein.

### **3. On what legal ground(s) do we process personal data in relation to case sampling?**

We process personal data on the basis of Article 14(4) of the EUAA Regulation, as well as Article 31(1)(b) of the said Regulation, which refer to carrying out case sampling for the purposes of monitoring.

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 for the purpose of fulfilling its mandate by virtue of the EUAA Regulation.

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

Whereas all efforts will be made to ensure that the case files are fully anonymised, the following categories of pseudonymised personal data relating to applicants may be further processed for the purposes of carrying out the case sampling analysis:

- Nationality or statelessness status;
- Region of residence in the country of origin or, in the case of a stateless person, in the country of former habitual residence;
- Sex;
- Age group, indicated by decade with the second digit removed; applicants under 18 years of age shall be explicitly identified as minors;
- Family status, including unaccompanied child, family with children, etc.;
- Language(s);
- Assessment on vulnerabilities, including medical status, age assessment, etc.
- Claims and evidence regarding the international protection application, including religious beliefs, political opinions, membership of a particular social group, ethnic group or race, etc.
- Travel routes and previous places of residence;

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<sup>4</sup> For further information on the safeguards and processing of personal data in Commission machine translation tools, see: European Commission Language Tools – Help page (Data protection and privacy), available at <https://language-tools.ec.europa.eu/help?lang=en&app=dpr>.



- Visas issued, educational history, and family links, where relevant for the analysis of cases in relation to Regulation 2024/1351<sup>5</sup>;
- Assessments performed by the national authorities as part of the international protection procedure(s);
- Outcome of international protection procedure(s);
- Reception/accommodation status;
- Restrictions to freedom of movement applied;
- Detention status;
- Resettlement and humanitarian admission status.

#### **5. How long do we keep personal data in relation to case sampling?**

Personal data identified in point 4 may be kept until the adoption of the recommendations under Article 15 of the EUAA Regulation. After the adoption of the recommendations, the files are securely deleted from any media and data carrier used. Once the data has been deleted, the Member State is notified.

#### **6. How do we protect and safeguard personal data collected in relation to case sampling?**

In order to protect the personal data identified in point 4, we have put a number of technical and organisational measures in place 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.

The case files are transmitted by the Member State competent authority/ies via secure means and personal data is processed within the EUAA in a contained environment. Organisational measures include restricting access to personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

#### **7. Who has access to personal data collected in relation to case sampling and to whom are they disclosed?**

Access to the case files will be limited to the EUAA staff directly engaged in the analysis for monitoring purposes. Access to other EUAA statutory staff members will be given only on a strict need-to-know basis (for instance, personnel of the Information and Communications Technology Unit (ICTU), for security-related purposes).

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<sup>5</sup> Regulation (EU) 2024/1351 of the European Parliament and of the Council of 14 May 2024 on asylum and migration management, amending Regulations (EU) 2021/1147 and (EU) 2021/1060 and repealing Regulation (EU) No 604/2013 Regulation (EU) 2024/1351 of the European Parliament and of the Council of 14 May 2024 on asylum and migration management, amending Regulations (EU) 2021/1147 and (EU) 2021/1060 and repealing Regulation (EU) No 604/2013, (OJ L, 22.5.2024, p. 1, ELI: <http://data.europa.eu/eli/reg/2024/1351/oj>).



**8. Do we transfer any of the 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 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, the data subjects are entitled to access their personal data and to have inaccurate or incomplete data rectified. If the personal data are no longer needed by the EUAA or if the processing operation is unlawful, the data subjects have the right to request the erasure of the data. Under certain circumstances, such as if they contest the accuracy of the processed data or if they are not sure if the data are lawfully processed, data subjects may ask the Data Controller to restrict the data processing. Data subjects may also object, on compelling legitimate grounds, to the processing of data relating to them. Additionally, they have the right to data portability which allows them to obtain the data that the Data Controller holds on them and to transfer it from one Data Controller to another.

Should you have any queries/questions concerning the processing of personal data in relation to case sampling for the purposes of EUAA monitoring, or should you wish to exercise your rights, please contact the Data Controller, i.e. the Head of Monitoring Unit, by sending an e-mail to [monitoring@euaa.europa.eu](mailto:monitoring@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 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: 23 June 2026 (v.02)*