



Record on the processing of personal data of members of the teams of experts in the context of monitoring exercises

Last update of the record	10/09/2026
Data controller	Head of Monitoring Unit (MONU) of the Asylum Knowledge Centre (C3)
Joint controller (if applicable)	n/a
Data Processor (if applicable)	n/a
Name and description of processing	<i>'Processing of personal data of members of the teams of experts in the context of monitoring exercises'</i> covers the processing activities related to the setting up and management of the teams of experts of the Agency, in the context of the EUAA monitoring of the operational and technical application of the Common European Asylum System (CEAS). In particular, personal data of individuals who will be part of these teams is collected in electronic form, via email and/or the use of EU Survey tool, and it is processed to ensure efficient organisation of the monitoring exercises, for the on-site visits and any preparation and follow-up needed.
Purpose of processing	Personal data is processed for the following purposes: • task allocation within the team of experts and the specification of the activities within the on-site visit agenda; • organising meetings and training activities; • practical and logistical arrangements for the on-site visits, such as transportation, accommodation, access to locations, etc. • reimbursement of expenses in relation to the above-mentioned EUAA activities; • information exchange and collaboration in the course of the monitoring exercise; • providing and managing access to SharePoint sites that will serve as digital collaboration space.
Legal basis and lawfulness of processing	Personal data is processed on the basis of Article 2(1)(q) and Articles 14 and 15 of Regulation (EU) 2021/2303 ¹ (the 'EUAA Regulation') introducing the monitoring mechanism, as well as Article 47(5)(p) of the EUAA Regulation, according to which the Executive Director of the EUAA is responsible for setting up teams of experts for the purposes of the monitoring mechanism.

¹. 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>).





	Consequently, the processing operation is lawful under Article 5(1) point (a) of Regulation (EU) 2018/1725 ² (the 'EUDPR'). To the extent that the processing is based on explicit consent, the processing operation is lawful under Article 5(1)(d) of the EUDPR.
Description of (categories of) personal data processed	The following (categories of) personal data may be processed: • First name and surname; • Nationality; • Number of identity or travel document; • Employing entity, department/unit and location; • Title/position; • Email address; • Phone number; • Areas of expertise (self-reported); • Language skills (self-reported); • Existence of security clearance and corresponding level; • Availability; • Declared interests and absence of conflict of interests under Decision of the Executive Director No 20/2025;³ • Dietary requirements and allergies; • Comments and observations submitted in the context of the monitoring exercises; • Banking details for reimbursement.
Description of (categories of) data subjects	The members of the team of experts in the context of monitoring exercises include EUAA staff, Member States experts, European Commission experts and UNHCR observers.
Retention period	Two years from the setting up of the team, unless personal data is deleted at an earlier point, in the event that the data subject is no longer a member of the teams, or the data controller decides to erase data which is no longer needed, including upon conclusion of a monitoring exercise or a specific activity.
Recipients of the personal data	• The Executive Director, Executive Director's Secretariat, the EUAA Monitoring Unit and the Training Centre (with regard to training activities) for the purposes of the monitoring exercise; • Other EUAA personnel on a need-to-know basis, including personnel of the Institutional and Horizontal Affairs Centre and the Administration

² 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>).

³ Decision of the Executive Director No 20/2025 on the policy on the prevention and management of conflicts of interest, related postemployment and ethical guidance, and the role of ethics correspondent, available [here](#)



	Centre for the purposes of information and communication technology support, events organisation and reimbursement, security.; • The EUAA experts, Member States experts, European Commission experts and UNHCR observers participating in the team of experts, where and to the extent necessary for their work in the specific monitoring exercise; • The National Monitoring Coordinator of the Member State(s) subject to monitoring and the relevant national authorities on a need-to-know basis, in particular to ensure timely access to locations. • The nominating entity through the designated contact point for the EUAA monitoring mechanism. • Some personal data, such as name and surname, employing entity and job title, may be shared with members of the EUAA Management Board and with the EUAA Monitoring Network, on a need-to-know basis.
Transfers of personal data to third countries and/or international organisations	No. However, it may entail disclosing a limited set of personal data to an international organisation within the meaning of Article 3(21) of the EUDPR, namely the UNHCR in its capacity as an observer in the team of experts. The data shared are limited to what is necessary for the functioning of the team of experts and are disclosed only to the individuals nominated by UNHCR to take part in the particular team of experts as observers. For this purpose, explicit and informed consent will be sought prior to such disclosure and refusal or withdrawal of such consent would not affect participation in the team of experts.
Automated decision-making including profiling	No.
General description of security measures	All personal data in electronic format (e-mails, documents, etc.) are stored on the servers of the EUAA and in the EUAA's Electronic Records and Documents Management System (ERDMS) under a folder classified as 'sensitive', access to which is assigned only on a need-to-know basis. In order to protect the 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.
How data subjects can exercise their rights	By e-mail to the Data Controller: monitoring@euaa.europa.eu By e-mail to the Data Protection Officer (DPO): dpo@euaa.europa.eu By contacting the European Data Protection Supervisor (EDPS): supervision@edps.europa.eu