



PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data.

Processing operation: Processing of personal data within the framework of the new security badges and entry permits for Global Health EDCTP3 JU staff.

Record reference: DPO-01-04

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1. Introduction

The protection of your privacy is of high importance to Global Health EDCTP3 Joint Undertaking (hereinafter referred to as “**Global Health EDCTP3 JU**”). Global Health EDCTP3 JU is committed to respecting and protecting your personal data and ensuring your privacy rights.

Personal data processed with respect to security badges and entry permits for staff of Global Health EDCTP3 JU, is handled in a fair, lawful and transparent manner.

This processing operation is subject to Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of individuals regarding the processing of personal data by the Union institutions, bodies, offices, and agencies and on the free movement of such data.

This Privacy Statement is provided in accordance with Articles 15 and 16 of Regulation (EU) 2018/1725. It provides detailed information on categories of personal data processed, the purposes of processing, and the rights of data subjects in relation to the badges and entry permits management process.

2. Controller/ Joint controllers/Processors

The processing operation is carried out under the responsibility of the Executive Director of the Global Health EDCTP3 JU who acts as the Data Controller for processing activities concerning its own staff members. Personal data is processed in accordance with Regulation (EU) 2018/1725 by Global Health EDCTP3 JU, Avenue de la Toison d’Or 56-60, 1060 Brussels, Belgium. Global Health EDCTP3 JU can be contacted by post at following address TO 56, 1049 Brussels, Belgium or by email at hr@global-health-edctp3.europa.eu.

Global Health EDCTP3 JU has appointed a Data Protection Officer (herein after referred to as “**DPO**”) who ensures independently that Global Health EDCTP3 JU complies with applicable data protection law. The DPO can be contacted by post at following address TO 56, 1049 Brussels, Belgium or by email at data-protection@global-health-edctp3.europa.eu.

In the context of the security badge and entry permit management system, the European Commission Directorate-General for Human Resources and Security (hereinafter referred to as “**DG HR**”) acts as processor providing the centralised badge issuance and access management services in accordance with instructions received from the relevant Joint Undertakings.

In addition, Global Health EDCTP3 JU acts as processor for the purposes of security badges and entry permit management workflow on behalf of other participating Joint Undertakings (Clear Aviation JU, Europe’s Rail JU, Clean Hydrogen JU, Innovative Health Initiative JU, Chips JU, Circular Bio-based Europe JU, European Smart Networks and Services JU). Each participating Joint Undertaking acts as a Data Controller for the personal data of its staff members while Global Health EDCTP3 JU and DG HR process such personal data.

In addition, Global Health EDCTP3 JU relies upon the services of Microsoft Ireland as Cloud Service Provider (CSP) and Inetum as Licensing Solutions Provider (LSP), acting as processors. The use of M365 is based on licensing agreement between the Global Health EDCTP3 JU and Microsoft. Please find [here](#) the relevant data privacy notice.

3. Why and how do we process your personal data?

We process your personal data for the purpose of managing security badges and entry permits required to control access to the premises and secure areas of the participating Joint Undertakings.

Your personal data will not be used for an automated decision-making, including profiling.

4. Categories of data subjects

The data processing activity is applicable to following categories of data subjects:

- Global Health EDCTP3 JU staff: temporary, contractual
- Joint Undertakings (i.e. Clear Aviation JU, Europe's Rail JU, Clean Hydrogen JU, Innovative Health Initiative JU, Chips JU, Circular Bio-based Europe JU, European Smart Networks and Services JU) staff: temporary, contractual

5. Which personal data do we collect and further process and on which legal grounds?

Global Health EDCTP3 JU collects and further processes the following categories of personal data:

- Name and surname
- Organisation
- Date of Birth
- Nationality
- Personal number
- Type of contract and duration

This data is processed pursuant to Article 5.1(a) Regulation (EU) 2018/1725.

The necessity of processing is established under the following legal and administrative act:

- Amendment 6 of the Service Level Agreements signed between the Global Health EDCTP3 JU and the European Commission (DG HR)
- Memorandum of understanding related to the signature of the Service Level Agreement with European Commission (DG Human Resources) and Global Health EDCTP3 JU representing also Clear Aviation JU, Europe's Rail JU, Clean Hydrogen JU, Innovative Health Initiative JU, Chips JU, Circular Bio-based Europe JU, European Smart Networks and Services JU.

By adhering to these frameworks, we ensure that all personal data is processed lawfully, transparently, and with respect to the rights and privacy of the individuals involved.

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

6.1 Holders of access rights

Access to personal data is strictly limited on a need-to-know basis and is granted only to authorised personnel in accordance with their respective roles and responsibilities.

Within Global Health EDCTP3 Joint Undertaking, access is restricted to authorised members of the Human Resources team.

Within the European Commission Directorate-General for Human Resources and Security, access is restricted to authorised personnel involved in the operation of the badge and access management system.

6.2 Recipients of the data

Personal data may be disclosed, where necessary, to the following recipients:

- The European Commission Directorate-General for Human Resources and Security, acting as processor for the operation of the centralised badge and access management system;

- The participating Joint Undertakings (Clear Aviation JU, Europe's Rail JU, Europe's Rail JU, Clean Hydrogen JU, Innovative Health Initiative JU, Chips JU, Circular Bio-based Europe JU, and European Smart Networks and Services JU), for purposes related to the management of access rights of their respective staff.

7. How long do we retain your personal data?

Personal data is retained for a period corresponding to the duration of the individual's contract with the organisation.

Upon termination or expiry of the contract, the security badge and entry permit are withdrawn. Personal data is retained as required under Union law or for security, audit, dispute, or litigation purposes, in which case data is kept only for as long as strictly necessary. Please see data protection notice on Personnel files DPO-01-07, which you can find [here](#).

8. How do we protect and safeguard your personal data?

The Global Health EDCTP3 JU implements the following technical and organisational measures to safeguard your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access:

- Appropriate technical and organisational security measures, giving due regard to the risks inherent in the processing and to the nature, the purposes and the risks involved of the personal data concerned
- the storage and processing of personal data in accordance with the security standards and measures adopted by the JU
- Strict access controls ensuring that the personal data is accessible only to duly authorised staff members designated on a need-to-know basis.

Obligation of confidentiality of the staff involved in the processing of personal data.

These measures are regularly reviewed and updated, where necessary for an adequate level of security in line with applicable data protection requirements.

9. Transfer to a third country or international organisation

The Global Health EDCTP3 JU processes your personal data within the European Economic Area (EEA).

For any potential international data transfers and applicable transfer mechanisms for the use of Microsoft services, please visit the privacy statement of Global Health EDCTP3.

10. What are your rights and how to exercise them?

As a 'data subject' you have specific rights under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725. In particular

- You have the right to request access to all personal data processed by us pertaining to you.
- You have the right to rectification, i.e, to ask if any personal data pertaining to you that is inaccurate, be corrected.
- You have the right to withdraw your consent for processing your personal data.
- You have the right to erasure, i.e., to request that personal data pertaining to you be deleted if this data is no longer required in the light of the purposes outlined above in Heading 3.

- You have the right to restrict it instead of deletion, i.e., to request that we limit the processing of your personal data.
- You have the right not to be subject to a decision based solely on automated processing of data, including profiling, if such decision has legal effect on him or her, except for certain situations, such as entering a contract (as required by articles 14-16 & 24 of EUDPR).

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Global Health EDCTP3 JU's Data Protection Officer by post at the following address TO 56, 1049 Brussels or by email at data-protection@global-health-edctp3.europa.eu

The European Data Protection Supervisor (EDPS)

If you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Global Health EDCTP3 JU, as a data subject, you have a right to recourse to the European Data Protection Supervisor (EDPS) at any time by e-mail to edps@edps.europa.eu or a letter to the EDPS postal address marked for the attention of the EDPS DPO:

European Data Protection Supervisor
Rue Wiertz 60
B-1047 Brussels
BELGIUM

For more information on the EDPS, please consult their website: <https://www.edps.europa.eu>.

11. Where to find more detailed information?

The Global Health EDCTP3 JU's Data Protection Officer (DPO) publishes the Register of all processing operations on personal data by the Global Health EDCTP3 JU on the website. The Register can be found [here](#).

This specific processing operation has been included in the Global Health EDCTP3 JU Public Register with the following Record reference: DPO-01-04.