

DATA PROTECTION NOTICE

regarding the processing of personal data in the context of the contact tracing process related to the COVID-19 pandemic

1. Context and Controller

As Eurojust collects and further processes personal data in the context of contact tracing related to the COVID-19 pandemic, it is subject to Regulation (EU) 2018/1725 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.

Collection and processing of personal data in the context of contact tracing related to the COVID-19 pandemic are under the responsibility of the Controller, who is the Head of Human Resources Unit of Eurojust and can be contacted at hohrconfidential@eurojust.europa.eu.

2. What personal information do we collect, for what purpose, under which legal bases and through which technical means?

Legal basis of the processing

The legal bases for the processing activities are:

- Article 10(2)(b) of Regulation EU 2018/1725: processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health;
- Article 5(1)(a) of Regulation EU 2018/1725: processing is necessary for performance of tasks in the public interest assigned by Union legislation, and,
- Article 1(e) of the Staff Regulations providing that "*Officials in active employment shall be accorded working conditions complying with appropriate health and safety standards at least equivalent to the minimum requirements applicable under measures adopted in these areas pursuant to the Treaties*".

Purpose of the processing

The purpose of the processing is to record the data of persons who are confirmed to have the COVID-19 virus and who have been in the Eurojust premises and in close contact with other Eurojust post-holders, in order to inform those post-holders of the possibility of infection and their need to self-isolate.

Technical means

Technical measures include storing the data electronically in the HR Admin and the Security mailboxes, where access is restricted to staff working in the respective sectors. Where ELU must be notified, this information is sent to the personal mailbox of the Head of ELU, accessible only by him.

Types of personal data

The following data will be provided to HR Admin by email by persons who have been in the Eurojust premises in the last 10 days and are confirmed to have coronavirus:

- First and last name;
- Medical status (limited only to “confirmed COVID-19 positive test” and whether symptomatic or asymptomatic. No detail of symptoms or other health information);
- Date of onset of symptoms or, if asymptomatic, the date of the positive test (used to calculate the contact tracing period);
- Date(s) they were in the Eurojust premises in the 10 days prior to the above date, if applicable, and,
- A list of Eurojust post-holders/contractors or visitors to the Eurojust building (first and last name) with whom the person indicates they were in close contact during that period.

The following information will be provided to HR Admin by email by persons identified through Eurojust’s contact tracing process as close contacts, who subsequently test negative for coronavirus:

- First and last name
- Existence of negative test result (the test itself is not shared) and the date of the test, so that the person’s name can be removed from the list of persons not authorised to access the premises.

The following data will be provided by email from HR Admin to Security@eurojust.europa.eu:

- First and last name of persons not permitted to enter the premises, without specification of the reason (positive test, identified close contact etc.), and any update to that list i.e. when a person obtains a negative test result and is permitted to enter again.

The following data will be provided by email from HR Admin to Security@eurojust.europa.eu and/or NKarayannis@eurojust.europa.eu, as applicable:

- First and last name of persons identified as close contacts, with a template communication for SEC/ELU to send to the contractor/visitor by email notifying them that they have been identified as a close contact and advising the person to self-isolate and request a COVID-19 test.

3. To whom is your personal data disclosed?

Your data is disclosed to staff in the HR Admin team, the Head of the Human Resources Unit as data controller, staff working in the Security Unit (to update the list of persons permitted to enter the premises) and Events and Logistics Unit (only where an external contractor/visitor informs they have tested positive or is identified as a close contact).

4. How can you verify, modify or delete your information?

You have the right of access to your personal data and to relevant information concerning how we use it. You have the right to rectify your personal data. Under certain conditions, you have the right to ask that we delete your personal data or restrict their use. You have the right to object to our processing of your personal data, on grounds relating to your particular situation, at any time. We will consider your request, take a decision and communicate it to you. For more information, please see Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725. Please note that in some cases restrictions under Article 25 of Regulation (EU) 2018/1725 may apply.

If you wish to exercise your data subject rights, any such request should be directed to the Head of Human Resources Unit of Eurojust at hohrconfidential@eurojust.europa.eu.



You may also contact the Data Protection Officer at Eurojust at dpo@eurojust.europa.eu.

5. How long do we keep your personal data?

The data processed will be retained for one month, to ensure follow-up and contact tracing. After this period:

- HR Admin staff will delete the emails exchanged manually. No data will be stored elsewhere (DMS, physical files etc.).
- If applicable, ELU and SEC will delete the data they have received/sent.

6. Contact information

You have the right to access, rectify or erase or restrict the processing of your personal data or, where applicable, the right to object to processing or the right to data portability in line with Regulation (EU) 2018/1725.

Any such request should be directed to the Controller, by using the following email address:

hohrconfidential@eurojust.europa.eu, and by explicitly specifying your request.

You may also contact the Data Protection Office of the Eurojust (dpo@eurojust.europa.eu).

7. Recourse

You have the right to lodge a complaint to the European Data Protection Supervisor (https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en) if you consider that your rights under the Eurojust Regulation and/or Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data or seek a judicial remedy before the Court of Justice.