



### Eurojust record of processing activity

Record of processing personal data activity, based on Article 31 of 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.

#### Part I –Article 31 Record (this part is publicly available)

No.	Item	Description
<b>EUROMED JUSTICE</b> <b>PROCESSING OF THE PERSONAL DATA OF PARTICIPANTS ATTENDING DIFFERENT EVENTS IN THE CONTEXT OF EUROMED JUSTICE</b> <b>PROGRAMME</b>		
1.	<b>Last update of this record</b>	
2.	<b>Reference number</b> [For tracking, please contact the DP Office for obtaining a reference number.]	CAU-05.01 (September 2021)
3.	<b>Name and contact details of controller</b> [Use functional mailboxes, not personal ones, as far as possible - this saves time when updating records and contributes to business continuity.]	EuroMed Justice Program Coordinator <a href="mailto:EuroMedJustice@eurojust.europa.eu">EuroMedJustice@eurojust.europa.eu</a>  Postal address: P.O. Box 16183-2500 BD, The Hague (The Netherlands)  Office address: Johan de Wittlaan 9, 2517 JR The Hague (The Netherlands)
4.	<b>Name and contact details of DPO</b>	Eurojust Data Protection Office, reachable via <a href="mailto:dpo@eurojust.europa.eu">dpo@eurojust.europa.eu</a>

5.	<p><b>Name and contact details of joint controller (where applicable)</b></p> <p>[If you are jointly responsible with another EUI or another organisation, please indicate so here (e.g. two EUIs with shared medical service). If this is the case, make sure to mention in the description who is in charge of what and whom people can address for their queries.]</p>	n.a.
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No.	Item	Description
6.	<p><b>Name and contact details of processor (where applicable)</b></p> <p>[If you use a processor (contractor) to process personal data on your behalf, please indicate so (e.g. 360° evaluations, outsourced IT services or pre-employment medical checks).]</p>	<p>For the organisation of the meetings and for missions and payment of those mission expenses to external participants, - EuroMed Justice staff</p> <p>For mission authorization and the reimbursement of mission and travel expenses processed through the Eurojust tool for managing and reporting business travel and missions' expenses (EJ-MAP) - both nominated staff from Budget, Finance and Planning Unit and EuroMed Justice team</p>
7.	<p><b>Purpose of the processing</b></p> <p>[Very concise description of what you intend to achieve; if you do this on a specific legal basis, mention it as well (e.g. staff regulations for selection procedures).]</p>	<p>During the implementation phase of the EuroMed Justice programme, several types of meetings will be organised (CrimeEx meetings, Forum of Prosecutor's General, EMJNet, Conferences, workshops and other events). Participants from EU MSs and third countries will attend these events.</p> <p>The events will be organised online or face to face.</p> <p>Prior to these meetings, during the meetings and following the meetings, the EMJ programme team will collect and process personal data of the participants attending these meetings, in order to organise the meetings, travel, accommodation and other similar services and cover reimbursement costs, if necessary. List of participants can be drafted and circulated with the participants following the meetings, with their prior consent.</p> <p>For mission authorization and the reimbursement of mission and travel expenses processed through the Eurojust tool for managing and reporting business travel and missions' expenses (EJ-MAP) - both nominated staff from Budget, Finance and Planning Unit and EuroMed Justice team will process personal data.</p>

8.	<p><b>Description of categories of persons whose data are processed and list of data categories</b></p> <p>[In case data categories differ between different categories of persons, please explain as well.]</p>	<p>Categories of persons: participants attending EuroMed Justice meetings (online and face to face).</p> <p>Categories of data: title, last name, first name, organisation, function, email, phone, city and country, bank details, Visa details, travel details, Mission data such as the place of origin, place of destination, date and time of departure and arrival, organisational units the traveller belongs to, means of transportation, expenses incurred, name and place of accommodation, accommodation invoices, start and end times of professional commitments, possible combined holidays, possible request for advance payment, the budget line on which the missions will be paid, the EJ MAP mission number, the confirmation number created when the missions officer signs for agreement, information and documents submitted justifying the reimbursement, signature/e-Signature .</p>
9.	<p><b>Time limit for keeping the data</b></p> <p>[Indicate your administrative retention period including its starting point; differentiate between categories of persons or data where needed (e.g. in selection procedures: candidates who made it onto the reserve list vs. those who did not).]</p>	<p>Data will be kept until the conclusion of the EuroMed Justice Programme (March 2023 – subject to extension) for the data related to the organisation of the meetings per se.</p> <p>In order to comply with the EU Financial Regulation, data in EJ-MAP and in paper files are stored for a period of 5 years. In addition, a 2-year retention period is followed at Eurojust which starts running from the 31st December of the budget year associated to the mission. More concretely, for every transaction, there is a 2 year period before the discharge of the annual accounts after which the documents are retained for 5 years as per Financial Regulation.</p>
<b>No.</b>	<b>Item</b>	<b>Description</b>
10.	<p><b>Recipients of the data</b></p> <p>[Who will have access to the data within Eurojust? Who outside Eurojust will have access? Note: no need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS).]</p>	<p>EuroMed Justice Program Management Team tasked for this purpose by the Program Coordinator and designated staff from Budget, Finance and Planning Unit, for data related to the organisations of the missions and financial aspects).</p>

<p><b>11.</b></p>	<p><b>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</b></p> <p>[E.g. processor in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty. If needed, consult DPO for more information on how to ensure safeguards.]</p>	<p>Some of the participants in these meetings are from third countries, thus, transfer of certain data (list of participants) to parties outside of the EU/EEA may take place. In such cases, Chapter V of Regulation (EU) 2018/1725 in relation of personal data to third countries or international organisations applies. Eurojust will request the prior explicit consent of the data subjects concerned, in line with Article 50(1)(a) of Regulation (EU) 2018/1725.</p> <p>The registration form will be designed in such a way to allow consent/ refuse for being included in the list of participants and data being shared with the other participants.</p> <p>Data can be transferred to a third country in the following situations also:</p> <ul style="list-style-type: none"> <li>• To service providers (hotels, tourism companies, flight companies etc) organising/ facilitating/ executing services in relation with the participation of the data subject in the event;</li> <li>• To banks for the payments made by Eurojust in the bank accounts of the data subject;</li> </ul> <p>In these situations, the participant will be informed about the fact that some of their personal data will be transferred to a third country and will be asked for explicitly consent. The participant will be informed about the risks such transfers might involve, including higher risk for data (data intrusion, modification etc), less individual rights related to their personal data (right to to access, rectify or erase their personal data and the right to restrict or, where applicable, the right to object to processing or the right to data portability) or lower protection for the personal data (e. g. state authorities of the third country can access personal data pursuant to national security law or criminal law).</p> <p>In the situation when the organisation of a meeting/ mission is impossible to be organised without the transfer of data to third countries, should the participant decide not to provide such consent, the participant will be informed that he cannot participate in the meeting and the country that have nominated him will be invited to nominate a new participant.</p>
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12.	<p><b>General description of security measures, where possible.</b></p> <p>[Include a general description of your security measures that you could also provide to the public.]</p>	<p>Data is processed and stored in the Eurojust secure ICT environment.</p> <p>The mission authorization and the reimbursement of mission and travel expenses are processed through the Eurojust tool for managing and reporting business travel and missions' expenses (EJ-MAP).</p>
13.	<p><b>For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:</b></p> <p>[While publishing the data protection notice is not strictly speaking part of the record, doing so increases transparency and adds no administrative burden, since it already exists.]</p>	<p>Data protection notice attached to this record.</p>

## Data Protection Notice

### For processing of the data of participants attending different events in the context of Euromed Justice Programme

#### 1. Context and Controller

During the implementation phase of the EuroMed Justice programme, several types of meetings will be organised (CrimeEx meetings, Forum of Prosecutor's General, EMJNet, Conferences, workshops and other events). Participants from EU MSs and third countries will attend these events. The events will be organised online or face to face, depending on several factors to be assessed by the PMT. Prior to these meetings, during the meetings and following the meetings, the programme team will collect and process personal data of the participants attending these meetings, in order to organise the meetings, travel, accommodation and other similar services and cover reimbursement costs, if necessary. List of participants can be drafted and circulated with the participants following the meetings, with their prior consent. Collection and processing of personal data is under the responsibility of the data controller, who is the EuroMed Justice Program Coordinator ([EuroMedJustice@eurojust.europa.eu](mailto:EuroMedJustice@eurojust.europa.eu)).

#### 2. What personal information do we collect, for what purpose, on which legal basis and through which technical means?

##### *Legal basis*

The legal basis for the processing operations on personal data is Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012, (hereafter "the Financial Regulation") in particular Article 237 and for the processing of personal data in accordance with Article 5(1) of 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 (hereinafter - Regulation (EU) 2018/ 1725).

Processing is necessary for (1) compliance with legal obligation incumbent on the controller - Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union a.k.a. Financial Regulation (FR). (2) compliance with the obligations arising from the provisions of the Contribution Agreement ENI 2020/415-034 and (3) and with the prior consent of the data subject. Hence, it falls under the provisions of Article 5.1 b, c and d of the Regulation (EU) 2018/ 1725.

### ***Purpose of the processing***

The purpose of this process is to facilitate the organisation of the EuroMed Justice meetings as to achieve the objectives set out in EuroMed Justice Agreement.

### ***Technical means***

EuroMed Justice Program collects this information via an application form using EU survey platform or via direct contact using email or phone. Electronic forms are stored on Eurojust secure ICT environment with restricted access. The mission authorization and the reimbursement of mission and travel expenses are processed through the Eurojust tool for managing and reporting business travel and missions' expenses (EJ-MAP).

### ***Types of personal data***

The personal data of the following categories of persons will be processed: participants attending EuroMed Justice meetings (online and face to face).

The following categories of data will be processed: title, last name, first name, organisation, function, email, phone, city and country, bank details, Visa details, travel details, Mission data such as the place of origin, place of destination, date and time of departure and arrival, organisational units the traveller belongs to, means of transportation, expenses incurred, name and place of accommodation, accommodation invoices, start and end times of professional commitments, possible combined holidays, possible request for advance payment, the budget line on which the missions will be paid, the EJ MAP mission number, the confirmation number created when the missions officer signs for agreement, information and documents submitted justifying the reimbursement, signature/e-Signature.

### **3. Who has access to participants' personal data and to whom is it disclosed?**

EuroMed Justice Program Management Team tasked for this purpose by the Program Coordinator and Eurojust staff from Budget, Finance and Planning Unit.

Data can be transferred to a third country, to **banking institution** in order to execute payments, to travel agencies, travel companies, hotels and other intermediary or to the other participants to the meetings. The transfer would be based on **adequacy decision** (Art. 47) in absence of which on **appropriate safeguards** (Art. 48) or based on derogations (Art. 50. 1(b) and 50. 1(c)) from Regulation (EU) 2018/1725. For some data transfers (share of the list of participants with other participants, prior explicit consent will be required). Prior to asking explicit consent for transfers of data to third country, participants will be informed about the risks such transfers would involve.

### **4. How do we protect and safeguard your information?**

The information is electronically archived in the secured Data Management System of Eurojust. All IT tools at Eurojust are developed according to a standard set of security and are thoroughly tested accordingly, to ensure robustness and reliability. Paper files are stored in secured lockers and are destroyed in compliance with security procedures.

## **5. How can you verify, modify or delete your information**

In case you wish to verify which personal data is stored on your behalf by the Controller, have it modified, corrected, or deleted, or restrict the processing, or object to it or to exercise the right to data portability, please make use of the following email address: [EuroMedJustice@eurojust.europa.eu](mailto:EuroMedJustice@eurojust.europa.eu), by explicitly describing your request. Any correction of your personal data will be taken into consideration from the data protection point of view.

## **6. How long do we keep your personal data?**

Data will be kept for a limited period of time (until the closing of the programme – March 2023 – subject to extension of the programme) for programme facilitation, assuring continuity and consistency, auditing and accuracy purposes. In order to comply with the EU Financial Regulation, data in EJ-MAP and in paper files are stored for a period of 5 years. In addition, a 2-year retention period is followed at Eurojust which starts running from the 31st December of the budget year associated to the mission. More concretely, for every transaction, there is a 2 year period before the discharge of the annual accounts after which the documents are retained for 5 years as per Financial Regulation.

## **7. How can data subjects verify, modify or delete personal data?**

Data subjects have the right to access, rectify or erase or restrict the processing of the 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 data controller, by using the following email address: [EuroMedJustice@eurojust.europa.eu](mailto:EuroMedJustice@eurojust.europa.eu)

## **8. Contact information**

In case of queries regarding the processing of personal data:

Eurojust Data Protection Officer can be contacted via email: [dpo@eurojust.europa.eu](mailto:dpo@eurojust.europa.eu).

## **9. Recourse**

You have the right of recourse to the European Data Protection Supervisor EDP via email:

edps@edps.europa.eu or following the link: [https://edps.europa.eu/data-protection/our-rolesupervisor/complaints\\_en](https://edps.europa.eu/data-protection/our-rolesupervisor/complaints_en).