

PRIVACY STATEMENT

PREVENTION AND MITIGATION OF COVID 19 PANDEMIC [Ref 72]

1. What personal data do we collect?

In order to carry out this processing operation EASA collects the following categories of personal data:

- first name
- last name
- service
- place of employment
- medical data:
 - information and symptoms related to COVID-19 outbreak
 - result of the COVID-19 test
- list of close contacts with the staff member concerned over a period to be determined on a case-by-case basis after appearance of the first symptoms
- number of the office and building floor of the staff member concerned
- time of recovery necessary for resuming work.

Personal data may be obtained from the data subject and/or from EASA's services.

2. For what purpose do we collect personal data and on which legal basis?

EASA collects and uses your personal information to establish a list of the number of staff member affected by the SARS-CoV-2 virus in order to be able to do the necessary follow up and implement the mitigation measures to protect its staff during the COVID-19 pandemic.

This listing will help EASA to verify the fitness to work, according to the applicable legal and statutory obligations, and continue implementing policies to promote EASA staff health and wellbeing.

The collected information will enable EASA to implement procedures and policies to reduce the risk of infection in its premises, to protect the health of its staff and to provide adequate follow up.

The processing of personal data is based on:



- Article 5(1)(a) of Regulation (EU) 2018/1725: *‘processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body’.*
- Article 5(1)(e) of Regulation (EU) 2018/1725: *‘processing is necessary in order to protect the vital interests of the data subject or of another natural person.’*
- Article 10(2)(c) of Regulation (EU) 2018/1725: *‘the processing is necessary to protect the vital interests of the data subject or of another person where the data subject is physically or legally incapable of giving consent’.*
- Article 10(2)(g) of Regulation (EU) 2018/1725: *the processing is necessary for reasons of substantial public interest, on the basis of Union law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.*
- Article 10(2)(h) of Regulation (EU) 2018/1725: *the processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care (...).*
- Article 10(2)(i) of Regulation (EU) 2018/1725: *‘the processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare and of medicinal products or medical devices, on the basis of Union law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy’.*
- Article 1(e) of the EU Staff Regulations: *‘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.’*, applicable by analogy to by virtue of Article 10(1) and Article 80(4) of the Conditions of Employment of Other Servants of the EU (CEOS).

In addition, EASA ensure that medical confidentiality is respected at all times.

3. Who may receive your personal data?

Access to your personal data is provided to EASA staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle.



Such staff abide by statutory, and when required, additional confidentiality agreements.

Access to the medical data:

The EASA Medical Advisors.

Access to the personal data, except medical data:

Resources & Support Director, controller of this processing, the Head of Department – Human Resources and her assistant;

Executive Director and Head of ED Office;

2 staff members from the Personnel & Administration Section of the HR Department part of the COVID group designated to follow the list of COVID-19 cases;

Specific staff members from the COVID Group (ED Office, Medical Advisors, Communication, HR);

Contact point in Corporate Services in order to provide necessary sanitation of offices and shared spaces.

Specific access regarding individual cases:

Directors have access only to the information of the specific case concerning their Directorate;

Line managers of the person concerned inform EASA Medical Advisors of any situation requiring particular attention and, if needed, their Head of Department/Director and the HR Department.

If necessary, your personal data may also be communicated to national health authorities.

Your personal data may be further processed for archiving purposes in the public interest and subject to appropriate safeguards.

4. How long are your personal data kept?

All the medical data collected is kept in your medical file in accordance with the retention period applicable to these files.



As for the rest, your personal data will be deleted as soon as possible, taking into account the development of the COVID-19 crisis and in any event once the crisis has ended.

5. What are your rights?

You have the right to request from EASA access to and rectification or erasure of your personal data or restriction of processing.

You also have the right to object to processing of your personal data.

EASA should provide information on action taken on a request within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

A breach concerning your personal data should be communicated to you under certain circumstances. EASA should also ensure the confidentiality of electronic communications.

6. Who is the data controller and how to exercise your rights?

EASA should exercise the tasks of the data controller for the purpose of this processing operation.

To exercise the mentioned rights, you can contact the controller by sending an email to covid_med@easa.europa.eu

If you consider your data protection rights have been breached, you can always lodge a complaint with the EASA's Data Protection Officer (dpo@easa.europa.eu) or with the European Data Protection Supervisor: edps@edps.europa.eu