



**European Union Aviation Safety Agency**

FO Personal data processing records and compliance checklist - Public	Ref 082 EAMR
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Nr.	Item	Explanation
<b>European aero-medical repository (EAMR)</b>		
1.	Last update of this record	<b>22.09.2021</b>
2.	Reference number	<b>082</b>
<b>Part 1 – Article 31 of Regulation (EU) 2018/1725 - Record (recommendation: Publicly available)</b>		
3.	Name and contact details of the controller and of the staff member responsible	Controller: European Union Aviation Safety Agency (EASA) Staff member responsible and contact: <a href="mailto:EAMR-support@easa.europa.eu">EAMR-support@easa.europa.eu</a>
4.	Name and contact details of DPO	<a href="mailto:dpo@easa.europa.eu">dpo@easa.europa.eu</a>
5.	Name and contact details of joint controller (where applicable)	N/A
6.	Name and contact details of processor (where applicable)	<b>Insight Technology Solutions Belgium Inc./</b> Address: Romeinsesteenweg 468, 1853 Grimbergen, Belgium
7.	Purpose of the processing	The EAMR allows the NAAs and AMEs to exchange information regarding the medical certification of commercial pilots. Under Regulation EU 1178/2011 EASA is responsible to provide the tool and ensure its operationality. EASA’s processing is therefore strictly limited to operations that are necessary to maintain, correct, secure or enhance the functionalities and performance of the system hosting the data uploaded by the competent authorities of the member states. The medical data displayed in the repository and the upload of such data are under the responsibility and controllship of each competent authority. EASA does not process any of such data.
8.	Description of categories of persons whose data are	<b>Categories of persons whose data are processed within the EAMR:</b>





processed by EASA and list of personal data categories

- commercial pilots holding or applying for a class 1 medical certificate in accordance with Regulation EU 1178/2011
- aero-medical examiners (AMEs)
- Authorised/designated users of the EAMR

**Categories of personal data processed:**

**1. For the applicant or holder of a class 1 medical certificate:**

- full name
- date of birth
- nationality
- means of identification
- email address
- medical certificate data:
  - date of medical examination,
  - date of issue of the medical certificate
  - validity date of the medical certificate
  - presence of limitation (yes or no – the actual limitation is not included)
  - medical certificate number

**2. For the Aero-medical examiners (AMEs):**

- Full name
- Email address
- Validity date of the AME certificate
- Privileges (hear of an Aero-medical Centre or not)

**3. Authorised users of the EAMR**

- Name, surname
- Email address
- Organisation





9.	Time limit for keeping the data	<p>In accordance with Regulation EU 1178/2011, Annex IV, ARA.MED.150(b) – “All aero-medical records of licence holders shall be kept for a minimum period of 10 years after the expiry of their last medical certificate”. This includes medical certificate data stored in the EAMR.</p> <p>The platform will store the data for at least 10 years after the last issue of the medical certificate. Upon expiry of the last medical certificate access to these records will be further restricted in accordance with the applicable requirements.</p>
10.	Recipients of the data	<p><b>The data may be accessible to the following categories:</b></p> <ul style="list-style-type: none"><li>• designated staff of the competent authority of the medical certificate holders, who also have access to the paper based file</li><li>• the aeromedical examiner(AME) where the applicant applies for a medical examination based on an access code, or by other means of identification provided by the applicant</li><li>• The AME who issued the last medical certificate</li><li>• The applicants to view their own data (in read only mode)</li></ul> <p>EASA IT support and IT service providers, as necessary, to maintain, correct, secure or enhance the functionalities and performance of the system.</p>
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<p>There is not transfer of data possible to third countries or other international organisations.</p>
12.	General description of security measures, where possible.	<p>The access to the platform is restricted to authorised users only, and functionalities are limited in accordance with security roles designed for each user.</p>
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the below privacy statement.	<p>Once the data is inserted into the system an account is automatically created. This enables applicants to access and review their own data. The system creates an automatic notification for changes to the existing data.</p>





# PRIVACY STATEMENT

## European Aero-Medical Repository

### Ref 082

#### 1. What personal data do we collect?

Categories of personal data processed:

1. For the applicant for or holder of a class 1 medical certificate:

- full name
- date of birth
- nationality
- means of identification
- email address
- medical certificate data:
  - date of medical examination,
  - date of issue of the medical certificate
  - validity date of the medical certificate
  - presence of limitation (yes or no – the actual limitation is not included)
  - medical certificate number

2. For the Aero-medical examiners (AMEs):

- Full name
- Email address
- Validity date of the AME certificate
- Privileges (hear of an Aero-medical Centre or not)
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### 3. Authorised users of the EAMR

- Name, surname
- Email address
- Organisation

For initial population of the EAMR, where national repositories are available bulk import of the data may be considered.

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

The processing operations are based on Article 5(1)(a) and (b) of Regulation (EU) 2018/1725.

Under Regulation EU 1178/2011, annex VI- Part ARA, ARA.MED.160-‘Exchange of information on medical certificates through a central repository’ and the applicable AMC/GM, Member States collect the data of the medical certificate for the purpose of allowing traceability of the medical certificates and preventing medical tourism and fraud attempts.

By the same regulation EASA is responsible to provide the tool and ensure its operability. EASA’s processing is therefore strictly limited to operations that are necessary to maintain, correct, secure or enhance the functionalities and performance of the system hosting the data uploaded by the competent authorities of the member states.

The medical data displayed in the repository and the upload of such data are under the responsibility and control of each competent authority. EASA does not process any of such data.

## 3. Who may receive your personal data?

The data may be accessible to the following categories:

- designated staff of the competent authority of the medical certificate holders, who also have access to the paper based file
- the aeromedical examiner(AME) where the applicant applies for a medical examination based on an access code or means of identification provide by the applicant





- The AME who issued the last medical certificate
- The applicants to view their own data (in read only mode)
- EASA IT support and IT service provider, as necessary, for support purposes and to ensure the platform's functionality

#### 4. How long are your personal data kept?

In accordance with Regulation EU 1178/2011, Annex IV, ARA.MED.150(b) – “All aero-medical records of licence holders shall be kept for a minimum period of 10 years after the expiry of their last medical certificate”. This includes medical certificate data stored in the EAMR.

The platform will store the data for at least 10 years after the last issue of the medical certificate. Upon expiry of the last medical certificate access to these records will be further restricted in accordance with the applicable requirements.

#### 5. What are your rights?

Once your data is inserted into the system an account is automatically created for you to be able to access and review your data.

You have the right to request from your competent authority the rectification of your personal data. A request to erase or restrict the processing of your personal data may only be attended if such action does not prevent competent authorities and EASA to comply with their legal mandate and obligations.

Upon request of the applicant there can be a change of competent authority, in which case, there will be a transfer of the privileges from the Member State's competent authority to another Member State's competent authority, thus a change to the competent authority before which you may exercise your rights.

EASA should provide information within the remit of its processing on actions taken upon a request within one month of receipt of such 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?

In accordance with Regulation EU 1178/2011, EASA is responsible for providing the EARM tool and to ensure its operationality. EASA's processing is therefore strictly limited to operations that are necessary to maintain, correct, secure or enhance the functionalities and performance of the system hosting the data uploaded by the competent authorities of the Member States..

To exercise your rights over data processed in the frame of EASA's control (i.e. maintenance, security, performance, correction of the system) please contact [EAMR-support@easa.europa.eu](mailto:EAMR-support@easa.europa.eu)

The control and processing of the data uploaded and stored in the EAMR is under the responsibility of each national competent authority. To exercise your rights over the data contained in the system please contact your competent authority.

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](mailto:dpo@easa.europa.eu)) or with the European Data Protection Supervisor: [edps@edps.europa.eu](mailto:edps@edps.europa.eu).

