

13 August 2025
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European Medicines Agency's Data Protection Notice For Mail Management

This Data Protection Notice explains the most essential details of the processing of personal data by the European Medicines Agency (hereinafter "EMA" or "Agency") in the managing of incoming and outgoing mail, as well as deliveries addressed to, received by, and sent from the Agency in the performance of its tasks.

It is important that you read and retain this notice, together with any other data protection notices we may provide on specific occasions when we are collecting or using personal data about you, so that you are aware of how and why we are using such data and what your rights are under the 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 data¹ (hereinafter "EUDPR").

1. Who is responsible for processing your data?

1.1. Who is the data controller?

The EMA, represented by its Executive Director ("ED") is responsible to comply with your data protection rights and freedoms. On behalf of EMA, the Head of Administration and Corporate Management Division is appointed as "Internal Controller" to ensure the lawful conduct of this processing operation.

You may contact the Internal Controller via the following email address:
datacontroller.administration@ema.europa.eu

1.2. Who is the data processor?

The Agency may engage third parties to process data on behalf of the Agency and, in particular, for activities related to logging outgoing mail consignments, scanning, management and storing of incoming mail.

¹ 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 (link available [here](#))

Activity	Provider	Contact
Logging outgoing mail and courier consignments (DHL)	ServiceNow Nederland B.V. Hoekenrode 3, 1102BR Amsterdam, the Netherlands	Privacy@servicenow.com
Scanning, management and storing of incoming mail (Cloud Services)	Microsoft Ireland Operations Limited One Microsoft Place, South County Business Park, Carmanhall and Leopardstown, D18 P521, Dublin, Ireland	https://www.microsoft.com/en-us/concern/privacyrequest-msa

2. Purpose of this data processing

The purpose of the data processing activity is the management of personal data in the context of registering all incoming and outgoing exchanges of business information received in paper format (e.g. letters, packages, or courier deliveries), in order to ensure appropriate records management and timely, consistent, and accurate replies in line with the principle of good administration. These actions include:

- (digital) screening, scanning, and registering of incoming mail;
- emailing the recipients about incoming mail;
- fulfilling requests to post physical mail or courier consignments using the Agency's ticketing system².

2.1. Personal data concerned

In these processing operations EMA processes personal data about data subjects who receive or send letters, parcels or other physical correspondence in the execution of their tasks related to the Agency's duties. Such data may include the following:

- Title, first name, last name of the sender and addressee of the communication;
- Contact details e.g. address information: street, postcode, town, country and at least one current valid method for immediate contact (personal e-mail address, private or business telephone number).
- Personal data included in the content of the incoming mail that are scanned and sent electronically to the recipient(s) of this mail.

The above personal data may be provided by senders of mail and/or parcels but will not be collected from third parties or public sources.

² For more information, please see https://www.ema.europa.eu/en/documents/other/european-medicines-agencys-data-protection-notice-ema-help-desk_en.pdf

2.2. Legal basis of the processing

This data processing activity is necessary for the management and functioning of the Agency, as well as the performance of the Agency tasks carried out in the public interest in line with Article 5(1)(a) EUDPR, as required by Regulation (EC) No 726/2004³ in combination with Regulation 2018/1718⁴, Directive 2001/83/EC⁵, Regulation 2019/6⁶ and other applicable Union legislation. More specifically:

- Art. 9 of Regulation (EU) 2015/496 of 17 March 2015 amending Regulation (EEC, Euratom) No 354/83 as regards the deposit of the historical archives of the institutions at the European University Institute in Florence Regulation (EC)⁷;
- Regulation (EU) 2023/2854 of the European Parliament and of the Council of 13 December 2023 on harmonised rules on fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Act)⁸;
- Regulation No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community⁹;
- Commission Decision (EU) 2021/2121 of 6 July 2020 on records management and archives¹⁰;
- Article 24 of "The European code of Good Administrative Behaviour"¹¹.

3. How long do we keep your data?

The duplicates of scanned documents are retained and processed internally within the functional email mailbox for a period of two years and then they are deleted. The deletion is executed manually following a reminder automatically generated.

For details on the retention period for Outlook 365 folders, please consult the relevant data protection notice¹².

All physical copies are locked in a lockable cabinet that is located inside the mailroom. Access to the mailroom is restricted by access control system. The cabinet is an additional measure to enhance safety of the physical mail. Records shall only be retained for as long as necessary to support EMA's business activities or comply with legal obligations.

³ Regulation (EC) No 726/2004 of the European Parliament and of the Council of 31 March 2004 laying down Union procedures for the authorisation and supervision of medicinal products for human use and establishing a European Medicines Agency (link available [here](#))

⁴ Regulation (EU) 2018/1718 of the European Parliament and of the Council of 14 November 2018 amending Regulation (EC) No 726/2004 as regards the location of the seat of the European Medicines Agency (link available [here](#))

⁵ Directive 2001/83/EC of the European Parliament and of the Council of 6 November 2001 on the Community code relating to medicinal products for human use (link available [here](#))

⁶ Regulation (EU) 2019/6 of the European Parliament and of the Council of 11 December 2018 on veterinary medicinal products and repealing Directive 2001/82/EC (link available [here](#))

⁷ Council Regulation (EU) 2015/496 of 17 March 2015 amending Regulation (EEC, Euratom) No 354/83 as regards the deposit of the historical archives of the institutions at the European University Institute in Florence (link available [here](#))

⁸ Regulation (EU) 2023/2854 of the European Parliament and of the Council of 13 December 2023 on harmonised rules on fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Act)(link available [here](#))

⁹ Regulation No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community (link available [here](#))

¹⁰ Commission Decision (EU) 2021/2121 of 6 July 2020 on records management and archives (link available [here](#))

¹¹ The European Code of Good Administrative Behaviour (link available [here](#))

¹² European Medicines Agency's Data Protection Notice for the use of Microsoft Applications: OneDrive, Outlook 365, Teams and SharePoint EMA/188185/2023 Rev.1 (link available [here](#))

4. Who has access to your information and to whom is it disclosed?

The following persons have access to your information:

- Security personnel who is responsible for screening all post and courier consignments entering EMA premises;
- Personnel of the EMA Mailroom handling the incoming and outgoing mail deliveries. In cases of restricted access to the building or other reasons requiring it, presupposed that the delivery is not of confidential nature, these items are opened, scanned and emailed to the recipients, after prior communication and agreement.

Furthermore, we may share these archives with the following external institutions, on a need-to-know basis or when the Agency is required to do so by law, including for monitoring, auditing or inspection purposes in accordance with European Union law:

- the Paymaster Office (Office for the Administration & Payment of Individual Entitlements) of the European Commission;
- the European Ombudsman;
- the Court of Justice of the EU;
- the European Court of Auditors;
- the European Anti-Fraud Office (OLAF); and
- the European Data Protection Supervisor.

5. Your data protection rights

As data subject (i.e. the individual whose personal data is processed), you have a number of rights:

- **Right to be informed** – This Data Protection Notice provides information on how EMA collects and uses your personal data. Requests for other information regarding the processing may also be directed to the Internal Controller.
- **Right to access** – You have the right to access your personal data. You have the right to request and obtain a copy of the personal data processed by EMA.
- **Right to rectification** – You have the right to obtain - without undue delay - the rectification or completion of your personal if it is incorrect or incomplete.
- **Right to erasure** – You have the right to require EMA to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing. In certain cases, your data may be kept to the extent it is necessary, for example, to comply with a legal obligation of the Agency or if it is necessary for reasons of public interest in the area of public health.
- **Right to restrict processing** – In a few, codified cases, you have the right to obtain the restriction of the processing, meaning that your data will only be stored, but not actively processed for a limited period of time. For more information about this right and its limitations, see the general EMA Data Protection and Privacy policy, hosted at <https://www.ema.europa.eu/en/about-us/data-protection-privacy-ema>.

- **Right to object** – You have the right to object at any time to this processing on grounds related to your particular situation. If you do so, EMA may only continue processing your personal data if it demonstrates overriding legitimate grounds to do so or if this is necessary for the establishment, exercise or defence of legal claims.
- **Right to data portability** - Where the processing is carried out based on your consent and in automated means you have the right to receive your personal data (which was provided to the EMA directly by you) in a machine-readable format. You may also ask the EMA to directly transfer such data to another controller.

The rights of the data subject can be exercised in accordance with the provisions of EUDPR. For anything that is not specifically provided for in this Data Protection Notice, please refer to the contents of the general EMA Data Protection and Privacy policy: <https://www.ema.europa.eu/en/about-us/data-protection-privacy-ema>.

6. Recourse

In case you have any questions regarding the processing of your personal data, or you think that the processing is unlawful, or it is not in compliance with this Data Protection Notice or the general EMA Privacy Policy, please contact the **Internal Controller** at datacontroller.administration@ema.europa.eu or the **EMA Data Protection Officer** at dataprotection@ema.europa.eu

You also have the right to lodge a complaint with the **European Data Protection Supervisor (EDPS)** at any time at the following address:

- Email: edps@edps.europa.eu
- Website: www.edps.europa.eu
- Further contact information: [Contact Us | European Data Protection Supervisor](#)