



EMA/36991/2021

## Record of data processing activity relating to the Security Access Control System (public)

1.	Last update of this record, version number:	22 September 2022, version 3
2.	Reference number:	A35
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of Administration and Corporate Management Division of EMA, <a href="mailto:dataprotection.administration@ema.europa.e">dataprotection.administration@ema.europa.e</a>
4.	Name and contact details of DPO:	<a href="mailto:dataprotection@ema.europa.eu">dataprotection@ema.europa.eu</a>
5.	Name and contact details of joint controller (where applicable)	Not applicable.
6.	Name and contact details of processor (where applicable)	Contracted security company: G4S Address: Director Government, G4S Security Services B.V., Hogehilweg 12.1101 CD Amsterdam, The Netherlands Email: <a href="mailto:enquiries@uk.g4s.com">enquiries@uk.g4s.com</a>  Reception and hosting service company: SPIRIT HOSTESS SERVICES PROMO ADVIEZEN BV Address: General Aviation Terminal, Thermiekstraat 30, 1117 BC Schiphol-Oost Email: <a href="mailto:info@spirithospitality.nl">info@spirithospitality.nl</a>
7.	Purpose of the processing	<p>The purpose of this data processing activity is to operate the Agency's Security Access Control System (AACC) in order to protect EMA premises against unauthorised access, theft as well as against both external and internal threats.</p> <p>The system consists of card readers connected to the badges used by staff members and alarm points installed at the entrances of the building and the floors as well as different rooms. These entrances only open if a badge is swiped at the card reader which has authorisation to access the premises. Visitor cards do not have such authorisation; visitors are only able and allowed to move within the building together with their host.</p> <p>The data held in the AACC is required to control the access to different areas within EMA's premises and to ensure the security of its personnel, visitors, operations and assets.</p>

**Official address** Domenico Scarlattilaan 6 • 1083 HS Amsterdam • The Netherlands

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		<p>The system is also used for the investigation of security related incidents and in case of a building evacuation.</p> <p>A report from the system of EMA staff presence in the building for the purpose of spot checks against the minimum required presence in the EMA building.</p> <p>A report from the system of contractors for the purpose of verifying the physical presence in the building where the applicable contract specifies that intra-muros ('on-site') rates apply and, therefore, said verification is necessary to process the payment of services to the contractor. A report from the system of EMA staff presence in the building is used for the purpose of payment of the contribution towards staff commuting costs.</p> <p>Data from the system might be used in the framework of an administrative enquiry or disciplinary procedure following a regulated and documented process.</p>
8.	Description of categories of persons whose data EMA processes and list of data categories	<p>The following categories of data subject are subject to this processing operation:</p> <ul style="list-style-type: none"> <li>EMA staff members (including national experts, interim and trainee staff), as well as contractors, delegates &amp; visitors entering the EMA premises.</li> </ul> <p>The following categories of personal data are collected for this processing operation:</p> <ul style="list-style-type: none"> <li>For permanent badge holders, contractors, and delegates, the collected personal data include: Permanent badge holder's name, staff identification number (EMA staff only), photo, badge number/ID, badge type, entry/expiry date and access level</li> <li>For temporary badge holders the same data as above is collected, excluding the photo and the staff identification number.</li> <li>Movement data regarding all badges: date, time, and location where card is swiped.</li> </ul>
9.	Time limit for keeping the data	<p>Duration of contract/nomination for permanent badge holders, such as EMA staff members (including interim and trainee staff), contractors or delegates.</p> <p>6 months for movement data referred to permanent and temporary badge holders including period after termination of employment/nomination or visit, for investigative purposes.</p> <p>5 years following discharge of the relevant budget year, for the report from the system for the purposes of: i) calculation of payment for "intra-muros" rates for contractors; ii) calculation of a payment to individual EMA staff commuting costs.</p>
10.	Recipients of the data	<p>EMA staff within Security Service responsible for enrolling and processing staff, delegates, contractors, and visitor access cards in the security access control system.</p> <p>EMA security and reception contractors for processing visitors, contractors, delegates and provide temporary cards to staff in case of forgotten permanent badges or answer other queries.</p> <p>Staff Matters Service receives a quarterly report from the system about EMA staff presence in the building for the purpose of the payment of a contribution to staff commuting costs. Head of A-ST Department receives the report for the purpose of spot checks on the minimum required presence in the building.</p>

		<p>Office of the Central Information Technology Office receives the report receives the report for the purpose of verifying the physical presence in the building of contractors where the applicable contract specifies that intra-muros ('on-site') rates apply.</p> <p>Managers and investigators when requested in the framework of administrative enquiries or disciplinary procedures.</p> <p>All personnel with access rights to the AACC system receive data protection training.</p>
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	N/A
12.	General description of security measures, where possible.	<p>The Agency has appropriate technical and organisational measures in place, including organisational policies, to safeguard the security of personal data and ensure the confidentiality, integrity and availability of the relevant systems, services and the personal data processed within them. In particular,</p> <ul style="list-style-type: none"> <li>• The servers storing the access control data are located within secure premises on a secure network and protected by additional physical security measures.</li> <li>• Access rights to AACC system users are granted only to the system modules which are strictly necessary to carry out their roles. The access to those modules is protected with personal password.</li> <li>• Very limited access to the Security Office and other security areas where access to Access Control software is possible.</li> <li>• No longer usable media are safely disposed in such a way that remaining data on them are permanently and irreversibly deleted. This is done in accordance with ICT policies.</li> </ul>
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	<p>Details concerning the processing of your personal data are available on the Agency's website at: <a href="https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement">https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement</a>, where you may find the EMA General Privacy Statement as well as the privacy statements on specific data processing operations.</p> <p>Training is provided for new members of EMA staff and contractors explaining AACC data transfer process and data protection regulations.</p>