



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

7 November 2025
EMA/47432/2021

Records of data processing activity

Name and reference number of processing operation: Workstation Ergonomics in the context of Health & Safety of staff and contractors, EMA-A-039

1.	Last update of this record, version number:	7 November 2025 version 3					
2.	Reference number:	A-039					
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of the Administration and Corporate Management Division Contact: DataController.Administration@ema.europa.eu					
4.	Name and contact details of DPO:	dataprotection@ema.europa.eu					
5.	Name and contact details of joint controller (where applicable)	N/A					
6.	Name and contact details of processor (where applicable)	<table><tr><th>Activity</th><th>Provider</th></tr><tr><td> • Provide information and training to staff and contractors on ergonomic matters; • Review staff and contractor ergonomic self-assessments; • Follow up on issues identified including provision of individual </td><td>Laboritas B.V. Europalaan 16 2408 BG Alphen aan den Rijn- the Netherlands</td></tr></table>	Activity	Provider	• Provide information and training to staff and contractors on ergonomic matters; • Review staff and contractor ergonomic self-assessments; • Follow up on issues identified including provision of individual	Laboritas B.V. Europalaan 16 2408 BG Alphen aan den Rijn- the Netherlands	
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		advice or recommendations for additional support/equipment; - Record actions undertaken; - Record of the outcome of an individual case.		
		Storage of received data.	RiskWize Ltd T/A VinciWorks 77 Lower Camden Street, D02 XE80, Dublin-Ireland	
		Appointments for the ergonomics assessment (OneDrive, Outlook).	Microsoft Ireland Operations Limited One Microsoft Place, South County Business Park, Carmanhall and Leopardstown, D18 P521, Dublin-Ireland	
7.	Purpose of the processing	This assessment and training are part of the Agency's compliance with Dutch Health & Safety requirements, who are users of display screen equipment ('DSE'), and may include: - Information and training on ergonomic matters in line with Dutch Health & Safety requirements; - First registration in the system to the relevant departments of EMA Administration and Corporate Management Division (for staff) and by Procurement and Purchase Standards (for contractors); - Allocating log in details to the user's account; - Collection and review of staff and contractor ergonomic self-assessments via a dedicated questionnaire; - Follow-up on issues identified including provision of individual advice or recommendations for additional support/equipment; - Recording of actions undertaken and the outcome of an individual case e.g. whether issue is resolved or still ongoing and whether further action is required; - Assessment for in-site or teleworking conditions; - Preparation for the appointment for workstation ergonomics/DSE assessment; To comply with the legal obligations, EMA is using an ergonomics at work solution supplied by VinciWorks. VinciWorks is the name of the database where user profiles, training and assessment records are documented and stored. <i>ErgoWize</i> is the name of the ergonomics training and assessment package.		
8.	Description of categories of persons whose data EMA processes and list of data categories	EMA staff including Temporary and Contract Agents, Trainees, but also Interims, Seconded National Experts and other type of contractors working at the Agency. Data is directly collected from participants when submitting response to the self-assessment questionnaire. Such data may include the following: - Basic personal information, e.g. surname, first name; - Staff or other contractor status and start date of employment; - Desk or office number, organisational entity, internal email address and phone number, if applicable (extracted from SAP internal database		

		by dedicated team members of EMA Administration and Corporate Management Division); • Date and time of the appointment for the workstation/DSE assessment; • Responses provided to the self-assessment questionnaire; • Individual feedback that may include health-related data; • Health-related data requested from the Occupational Health Physician to support claims regarding occupational health assessment and amendments; • Personal data collected via a dedicated questionnaire the workstation ergonomics risk assessor (a contractor or a dedicated member of EMA Administration and Corporate Management Division) when reviewing and updating individual ergonomic self-assessments after a visit to the user at their EMA workstation; • Personal data related to the ergonomic equipment: details of the current equipment and adjustments (e.g. chair settings) made during an assessor visit or the supply of new equipment: any non-standard aids (e.g. cushion or wrist rest); furniture (e.g. different type of chair, foot support); or IT equipment (e.g. ergonomic mouse or keyboard).											
9.	Time limit for keeping the data	<table><tr><th>Type of data</th><th>Retention period</th></tr><tr><td>Ergonomic assessment and training, appointments for the DSE assessment</td><td>During employment: 10 years from each assessment and training; After the end of the employment but during 10 years from the assessment: 2 years; After the employment and during a labour dispute/legal action: until the matter is resolved.</td></tr><tr><td>Health data, voluntarily provided during the ergonomic assessment, for adequate response to ergonomic needs and possible entitlements depending on employees' health, and forwarded to the Occupational Health Physician, psychologist, DSE assessor at EMA</td><td>20 years from the end of the staff member's employment, or after the termination of the contract between the Agency and the occupational health and safety service or company doctor.</td></tr><tr><td>Record of participation in the ergonomic training/DSE assessment</td><td>During employment: kept for as long as the individual is employed at EMA; After the end of employment: 2 years.</td></tr><tr><td>User account in the providers' database</td><td>As long as the contractor is providing services to the Agency</td></tr></table>	Type of data	Retention period	Ergonomic assessment and training, appointments for the DSE assessment	During employment: 10 years from each assessment and training; After the end of the employment but during 10 years from the assessment: 2 years; After the employment and during a labour dispute/legal action: until the matter is resolved.	Health data, voluntarily provided during the ergonomic assessment, for adequate response to ergonomic needs and possible entitlements depending on employees' health, and forwarded to the Occupational Health Physician, psychologist, DSE assessor at EMA	20 years from the end of the staff member's employment, or after the termination of the contract between the Agency and the occupational health and safety service or company doctor.	Record of participation in the ergonomic training/DSE assessment	During employment: kept for as long as the individual is employed at EMA; After the end of employment: 2 years.	User account in the providers' database	As long as the contractor is providing services to the Agency	
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10.	Recipients of the data	The data collected will be processed internally by dedicated staff within of EMA Administration and Corporate Management Division. The external ergonomic assessor also has access for the purpose of following up on ergonomic issues identified by users and providing individual guidance or advice. Personal data of staff may be disclosed to the relevant team of EMA Administration and Corporate Management Division and to the external medical service provider (Occupational Health Physician, psychologist, DSE assessor), in order to assist with occupational health assessments. Personal data of contractors may be disclosed to their employer, to confirm participation to the training and assessment in relation to workstation ergonomics had taken place.											

		The appointments to the DSE assessment are accessible only to the person performing the DSE during the session and the dedicated EMA staff from of EMA Administration and Corporate Management Division that coordinate the procedure. In particular, only the dedicated staff and nominated contractors coordinating the project have password protected access to data not containing any health information. Additionally, the personal data is processed by VinciWorks staff members in order to provide the service. Details on VinciWorks processing are available in their relevant data protection policy. Furthermore, personal data contained in the personal file may be shared 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: • Office for the Administration and Payment of Individual Entitlements - Paymaster Office (PMO) from the European Commission; • any bodies involved in the context of any matter of a medical nature or a complaint which arises in connection with the Sickness Insurance Scheme (JSIS); • 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.
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.	To protect personal data of data subjects, EMA has put in place several contractual safeguards complemented by technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation. Only the dedicated staff and nominated contractors coordinating the project have password protected access and only to data not containing any health information.

13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the relevant Data Protection Notice:	Details concerning the processing of your personal data are available on the Agency's website at: Data protection and privacy at EMA European Medicines Agency (EMA) The relevant data protection notice regarding this specific data processing operation is available in the internal Agency's document repository.
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