

22 July 2026
EMA/169959/2026
European Medicines Agency

European Medicines Agency's Data Protection Notice

For conducting surveys via Microsoft Forms

This Data Protection Notice provides details on how the European Medicines Agency (hereinafter 'the Agency' or 'EMA'), in its capacity as data controller, will process the information that you provide in response to a survey via Microsoft Forms. Microsoft (MS) Forms is part of the suite of cloud-based products included in Office 365 offered by Microsoft.

When using MS Forms for creating and managing surveys, your personal data provided within the survey form will be processed in accordance with Regulation (EU) 2018/1725¹ on the protection of individuals regarding the processing of personal data by the Union institutions and bodies on the free movement of such data (hereinafter 'EUDPR').

1. Who is responsible for processing your data?

1.1. Who is the data controller?

The European Medicines Agency ("EMA") is ultimately responsible to comply with your data protection rights and freedoms. Internally, the Head of Division/Task Force organising the survey is appointed as 'Internal Controller' to ensure the lawful conduct of this processing operation. The contact details of the Internal Controller can be obtained from the survey organiser.

1.2. Who is the data processor?

EMA uses the web-based MS Forms platform, which is hosted on the EMA Azure cloud tenant.

The contact details of the data processor are the following:

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

- Microsoft Ireland Operations Limited, South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland¹

You can contact the Microsoft Chief Privacy Officer or the Data Protection Officer by using this [web form](#).

EMA may engage with additional third parties to process data on behalf of the Agency. Further information can be obtained from the survey organiser.

2. Purpose of this data processing

The purpose of the use of MS Forms is to collect views of stakeholders and/or concerned/interested individuals in relation to a particular subject-matter of the survey.

While filling in the survey, Microsoft may store cookies on your device for several purposes. Where required, Microsoft will obtain your consent prior to placing or using optional cookies that are not (i) strictly necessary to provide the website; or (ii) for the purpose of facilitating a communication. For more information on how Microsoft uses cookies refer to the following section of Microsoft's Privacy Statement: "[Cookies and similar technologies](#)".

2.1. Personal data concerned

The Agency may collect personal data as part of a survey, namely:

- Full name
- Job title and place of employment
- Contact details
- IP address
- Language chosen for drafting the reply
- Your view on the topics concerned
- Date and time of survey completion (start time and completion time)
- Country of residence
- Microsoft may save username and email address of your EMA account for authentication purpose, if applicable.

Please refrain from disclosing any additional personal data in free text fields to avoid the unnecessary processing of such information.

2.2. Legal basis of the processing

When you participate in a survey and submit your reply, in accordance with Article 5(1)(d) of the EUDPR, you consent that EMA will process your personal data as explained in this data protection

notice. You may also withdraw your consent at any time (see Section 5). However, this will not affect the lawfulness of any data processing carried out before your consent is withdrawn.

In certain cases, when the survey's subject pertains to EMA's mandate and mission as delineated in pharmaceutical and other relevant Union legislation², your personal data will be processed pursuant to Article 5(1)(a) of the EUDPR. This means that such processing is required for the fulfilment of a task conducted in the public interest or in the exercise of official authority conferred upon the Union institution or body. In this regard, please note that you have the **right to object** against the processing as explained in Section 5 below.

The data collected in the context of this processing activity may also be shared with relevant authorities, as explained in Section 4 below and in accordance with Article 5(1)(b) of Regulation 2018/1725, when EMA is under a legal obligation to do so.

2.3. Transfer of personal data outside of EU

The personal data processed in Microsoft Forms is stored within the EU.

From time to time, Microsoft, acting as a processor of the Agency and together with its subcontractors, may need to transfer personal data to countries outside the EU. This can happen, for example, when they need to prevent or solve security issues. Any such transfers are only made with proper safeguards in place, as required by EU data protection law. This means that Microsoft will only transfer your personal data if the Agency instructs them to do so, or if they must comply with a specific legal obligation, and always in line with the rules set out in Regulation (EU) 2016/679 and the EUDPR.

Microsoft Corporation is certified under the EU-U.S. Data Privacy Framework, so any transfers of your personal data to the U.S. follow the requirements of this framework. If, for any reason, it is not possible to use the Data Privacy Framework, these transfers will then be governed by the 2021 Standard Contractual Clauses agreed between Microsoft Ireland Operations Limited and Microsoft Corporation.

3. How long do we keep your data?

If you submit a survey response, your personal data will be kept in MS Forms until the end of the response period. After this, the replies to the survey will be securely stored in the Agency's document and record management system until the results have been analysed. Your personal data will be deleted at the latest 12 months after the deadline for completing the survey.

² [EudraLex - Volume 1 - Public Health - European Commission](#)
[EudraLex - Volume 5 - Public Health - European Commission](#)

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

Access to the replies to the EMA survey is secured in MS Forms and in the EMA document and record management system and available to by authorised EMA staff.

All data is stored in Microsoft data centres based in the EU, Microsoft will only access data where it is necessary to provide their services.

Personal data collected via the survey will not be published, but aggregated survey results may be shared with interested parties.

The Agency may be required to share personal data with the Court of Justice of the EU, the European Ombudsman or the European Data Protection Supervisor (EDPS) if necessary in the framework of the performance of their duties. This is without prejudice to Regulation (EC) 1049/2001 regarding public access to documents.

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 withdraw consent** – You have the right to withdraw your consent to the processing of your personal data. However, this will not affect the lawfulness of any processing carried out before consent is withdrawn.

Please note that if you withdraw your consent, the Agency may not be able to provide certain services to you. EMA will advise you if this is the case at the time you withdraw your consent.

- **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 EMA General Privacy Statement, hosted at www.ema.europa.eu/en/about-us/legal/privacy-statement.

- **Right to 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.
- **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.

The rights of the data subject can be exercised in accordance with the provisions of Regulation (EU) 2018/1725. For anything that is not specifically provided for in this Data Protection Notice, please refer to the contents of the general EMA Privacy Statement: www.ema.europa.eu/en/about-us/legal/privacy-statement

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 Statement, please contact:

The contact details of the Internal Controller can be obtained from the survey organiser.

EMA Data Protection Officer at dataprotection@ema.europa.eu.

Address	Postal Address	EMA Switch Board
European Medicines Agency Domenico Scarlattilaan 6 1083 HS Amsterdam The Netherlands	European Medicines Agency PO Box 71010 1008 BA Amsterdam The Netherlands	+31 (0)88 781 6000

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: www.edps.europa.eu/about-edps/contact_en