



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

12 May 2026
EMA/118893/2026

Records of data processing activity for the engagement in active senior initiative

1.	Last update of this record, version number:	12 May 2026, Version 1									
2.	Reference number:	A-080									
3.	Name and contact details of controller:	European Medicines Agency Internally: the Head of 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 processors	<table><thead><tr><th>Processor</th><th>Activity</th><th>Contact Details</th></tr></thead><tbody><tr><td>Open Text Coöperatief U.A.</td><td>Online storage of documents (Electronic Document and Records Management System)</td><td>Prof. E.M. Meijerslaan 1, 1183 AV, Amstelveen-the Netherlands DPO@opentext.com</td></tr><tr><td>Microsoft Ireland Operations Limited</td><td>MS 365 services and applications to support EMA's administrative tasks and reporting processes</td><td>One Microsoft Place, South County Business Park, Carmanhall and Leopardstown, D18 P521, Dublin-Ireland https://www.microsoft.com/en-us/concern/privacyrequest-msa</td></tr></tbody></table>	Processor	Activity	Contact Details	Open Text Coöperatief U.A.	Online storage of documents (Electronic Document and Records Management System)	Prof. E.M. Meijerslaan 1, 1183 AV, Amstelveen-the Netherlands DPO@opentext.com	Microsoft Ireland Operations Limited	MS 365 services and applications to support EMA's administrative tasks and reporting processes	One Microsoft Place, South County Business Park, Carmanhall and Leopardstown, D18 P521, Dublin-Ireland https://www.microsoft.com/en-us/concern/privacyrequest-msa
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7.	Purpose of the processing	Leverage the expertise of former EMA staff members by engaging them in voluntary assistance in unpaid activities within the Agency. This allows the Agency to benefit from the skills of retired staff, regardless of their previous seniority, on a voluntary basis.									
8.	Description of categories of persons whose data EMA	Data subjects: former Temporary Agents and former Contract Agents									



	processes and list of data categories	Data categories: Data is directly collected from the former staff member when they sign their relevant agreement for the active senior initiative. Such data may include the following: • staff member’s name and surname; • current address; • private email address for communication; • nature and duration of the activity; • place where the activity will take place or remote; • data directly and voluntarily provided by the staff member to describe the individual circumstances to evaluate eligibility in accordance with the internal guidance on the implementation of each call for an ‘active senior’ initiative.									
9.	Time limit for keeping the data	<table><tr><th>Type of data</th><th>Retention Period</th></tr><tr><td> • Application for the active senior initiative • Decision of EMA • Agreement signed between the Agency and the retired staff member </td><td>8 years from the end of the calendar year in which the agreement was signed, or the last expenses payment was made (e.g. reimbursement of a mission), or until the end of a monitoring, audit or inspection (whichever is the latest)</td></tr><tr><td>Special Declaration of new occupational activity after the signature of the agreement</td><td>For the duration of the agreement</td></tr><tr><td>E-mail exchanges between current and former staff members through restricted email access</td><td>8 years from the end of the calendar year in which the agreement was signed, or the last expenses payment was made (e.g. reimbursement of a mission), or until the end of a monitoring, audit or inspection (whichever is the latest)</td></tr></table>	Type of data	Retention Period	• Application for the active senior initiative • Decision of EMA • Agreement signed between the Agency and the retired staff member	8 years from the end of the calendar year in which the agreement was signed, or the last expenses payment was made (e.g. reimbursement of a mission), or until the end of a monitoring, audit or inspection (whichever is the latest)	Special Declaration of new occupational activity after the signature of the agreement	For the duration of the agreement	E-mail exchanges between current and former staff members through restricted email access	8 years from the end of the calendar year in which the agreement was signed, or the last expenses payment was made (e.g. reimbursement of a mission), or until the end of a monitoring, audit or inspection (whichever is the latest)	
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10.	Recipients of the data	The data collected will be processed internally by dedicated staff dealing with the management of this initiative, as well as the relevant departments involved in the management, assessment, provisioning and use of these services from former staff members. This may include on a need-to-know basis: • hierarchically relevant line managers for the supporting activities of the retired staff member; • the Financial Support service; • the Meeting Management Support service; • the Deputy Executive Director, the Executive Director and Assistants to Executive Director; • the Internal Audit Service; • the Legal Department; • the Data Protection Officer (DPO). The European Commission’s services (Paymaster Office ‘PMO’ and Joint Sickness Insurance System ‘JSIS’) will be informed for the purpose of updating relevant HR systems in case of accident insurance or any other supplementary insurance coverage. Furthermore, we may share your personal data contained in your personal file 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 European Ombudsman; • the Court of Justice of the EU; • the European Court of Auditors; • the European Anti-Fraud Office (OLAF); • the European Data Protection Supervisor (EDPS) and • The European Public Prosecutor's Office (EPPO).
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 coordinating the project have password protected access.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	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) and in the specific Data Protection Notice, published at the EMA Intranet.