



20 February 2026
EMA/2681/2021

Records of data processing activity for handling the contribution towards commuting costs (Public)

1.	Last update of this record, version number:	20 February 2026, version 2		
2.	Reference number:	EMA-A-034		
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of Administration and Corporate Management Division 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)	Processor	Activity	Contact Details
		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
		SAP Belgium – Systems, Applications and Products N.V./S.A.	Operation and Maintenance of EMA's Human Resource Information System (HRIS)	Hermeslaan 9, 1831 Diegem-Belgium Privacy@sap.com
		Open Text Coöperatief U.A.	Online storage of documents (Document and Record Management System)	Prof. E.M. Meijerslaan 1, 1183 AV, Amstelveen-The Netherlands DPO@opentext.com
7.	Purpose of the processing	To establish an accurate, timely and effective processing of the contribution granted to all eligible recipients towards the daily commuting costs from their registered residence address in the Netherlands to EMA's office location in Amsterdam.		



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"> • Temporary and Contract Agents staff members in active employment; • Dutch National Experts during their secondment at the Agency (SNEs). <p>The following categories of personal data are collected for this processing operation:</p> <ul style="list-style-type: none"> • Basic personal information about the staff member, e.g. surname, first name, personnel number; • Recorded home address in the SAP HR database inserted by the staff member: e.g. street, postcode, city/town in the Netherlands; • Bank account details and the calculated amount to be transferred for the payment of the contribution; • Information obtained from the Security Access Control System (AACC) of EMA's premises in Amsterdam: e.g. list of dates when the staff member accessed the building during the period concerned (including dates on weekends or EMA holidays). 					
9.	Time limit for keeping the data	<table border="1"> <thead> <tr> <th data-bbox="625 1034 1054 1086">Type of data</th> <th data-bbox="1054 1034 1414 1086">Retention Period</th> </tr> </thead> <tbody> <tr> <td data-bbox="625 1086 1054 1319">Report (name, surname, personnel number) extracted from the AACC on the verified presence of staff and other contractors in the building for calculation and payment of commuting costs</td> <td data-bbox="1054 1086 1414 1319">8 years from the end of the year the payment has been made or until the end of a monitoring, audit or inspection</td> </tr> </tbody> </table>	Type of data	Retention Period	Report (name, surname, personnel number) extracted from the AACC on the verified presence of staff and other contractors in the building for calculation and payment of commuting costs	8 years from the end of the year the payment has been made or until the end of a monitoring, audit or inspection	
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10.	Recipients of the data	<p>The personal data obtained from the AACC is accessed and processed on a need-to-know basis by dedicated EMA staff members from the facilities support services and contractors within the security and reception services responsible for enrolling and processing staff.</p> <p>The personal data for the calculation of the contribution is processed internally by:</p> <ul style="list-style-type: none"> • dedicated members of the Staff Matters service team; • dedicated members from other organisational entities managing financial and budgetary obligations including the financial verifying agent, the financial initiating agent, the authorising officer, the accounting officer; • dedicated members from the Accounts Payable team of the accounting department (restricted to amount paid and name of eligible person); 					

		<ul style="list-style-type: none"> dedicated members from the Strategic Planning and Budget team (for analysis); the Executive Director and Assistants to Executive Director, the Deputy Executive Director, the Internal Audit Service, the Legal Department, the Data Protection Officer (DPO), in case of internal investigations, audits or other legal proceedings. <p>Furthermore, we may share your personal data 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:</p> <ul style="list-style-type: none"> the European Ombudsman; the Court of Justice of the EU; the European Court of Auditors; the European Anti-Fraud Office (OLAF); the European Public Prosecutor's Office (EPPO); and the European Data Protection Supervisor (EDPS).
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"> Paper copies are stored in locked cabinets. Keys kept in safe and the code of safe is only available to Personnel staff; Electronic copies can be accessed only by the dedicated EMA staff members handling commuting costs, through their personal password.
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:	<p>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)</p> <p>and in the specific Data Protection Notice for handling the contribution towards commuting costs, available in the EMA Intranet.</p>