



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

17 February 2026
EMA/225532/2023

European Medicines Agency's Data Protection Notice For the operation of the Security Access Control System

This Data Protection Notice explains the most essential details of the processing of personal data by the European Medicines Agency (hereinafter 'EMA' or 'Agency') in the context of operating the Security Access Control System ('AACC').

It is essential to read and retain this data protection notice, together with any other notice we may provide on specific occasions when we are collecting or using personal data about you, so that you are aware of how and why we are using such data and what your rights are under 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 data¹ (hereinafter 'the EUDPR').

1. Who is responsible for 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. On behalf of EMA, the Head of Administration and Corporate Management Division of EMA is appointed as a 'Data Controller' to ensure the lawful conduct of this processing operation.

You may contact the Internal Controller via the following email address: datacontroller.administration@ema.europa.eu

1.2. Who are the data processors?

The Agency may engage one or more contracted private security companies to support it in the operation of the AACC system.

The name and contact details of the data processors 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, OJ L 295, 21.11.2018, pp. 39–98 (link available [here](#))



Processor	Activity	Contact Details
SECURITAS BEVEILIGING B.V.	Processing of staff, visitors', contractors', delegates' data to issue either permanent or temporary badges for entrance and movement in the building	De Corridor 3 ^a , 3621 ZA Breukelen-The Netherlands Dataprotectionofficer@securitas.nl
SPIRIT HOSTESS SERVICES PROMO ADVIEZEN B.V.		General Aviation Terminal, Thermiekstraat 30, 1117 BC Schiphol-Oost-The Netherlands Info@spirithospitality.nl
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
DOMENICO SCARLATTI V.O.F.	Building Access Control System maintenance services	Graafsebaan 65, 5248JT Rosmalen-The Netherlands EMA-maintain@heijmans.nl

2. Purpose of this data processing

The purpose of this data processing activity is to operate the Agency's Security Access Control System ('AACC') in order to protect EMA's premises against unauthorised access and theft, as well as against both external and internal threats. The AACC system consists of a central server, doors' controllers, a software application and card readers installed at the entrances of the building, to the entrances on each floor and to the entrances to different rooms. These entrances open only after an access card, which has authorisation to access the premises is swiped at the card reader.

The data held in the Security Access Control System (AACC) is required to control the access to different areas within EMA premises and to ensure the security of its personnel, delegates, contractors, visitors, but also operations and assets. The system is also used

- to investigate security related incidents;
- to generate a list of persons present in the building in the event of a building evacuation;
- to generate a report of EMA staff attendance in the building for the purpose of monitoring the effective implementation and compliance with EMA decision on working time and hybrid working;
- to generate a report of EMA staff attendance in the building for the purpose of the payment of a contribution to staff commuting costs;
- to generate a report of contractors' attendance in the building for the purpose of verifying the physical presence in the building of contractors where the applicable contract implies physical presence in the building or it specifies that *intra-muros* ('on-site') rates apply and, therefore, said verification is necessary to process the payment of services to the contractor;

- to verify physical presence of Emergency Response Team ('ERT') members and First Aiders for the purpose of assessing and coordinating ERT and first aid response in the EMA building; and
- in case of need, the system data might also be used in the framework of an administrative enquiry or disciplinary procedure following a regulated and documented process.

2.1. Personal Data concerned

In the AACC system, EMA processes the data of people working at the Agency (Contract and Temporary Agents, Trainees, Interims, Seconded National Experts, and other types of contractors), delegates and visitors who enter the EMA premises. In particular, the data processed include:

For EMA staff, contractors and visitors: the permanent or temporary badge holder's name, surname, staff identification number (personnel number), photo, badge number/ID, badge type, entry/expiry date and access level. The latter two are linked to different access level depending on status as staff member or other type of contractor. Visitors do not receive staff identification number and do not have a picture obligation.

The AACC system also processes movement data of permanent and temporary badges including date, time, and location where a card is swiped. The system also records anomalies in badge, for example use of an expired card, or failure of a card to function or access denied due to lack of privileges to enter a specific area.

2.2. Legal basis of the processing

The processing of personal data in relation to the onboarding and work at EMA is necessary for the management and functioning of the Agency (Recital 22 of EUDPR) and the performance of its tasks in the public interest on the basis of Article 5(1)(a) of EUDPR. Further, the data processing is necessary (except for the contact details provided voluntarily for the case of emergencies) for the performance of contracts with the Agency on the basis of Article 5(1)(c) of EUDPR.

Please note that when the processing is based on public interest you have the right to object as explained in Section 5 below.

In addition, this data processing activity is necessary for the management and functioning of the Agency, as well as the performance of the Agency tasks carried out in the public interest as required by Regulation (EC) No 726/2004², on the establishment of EMA in combination with Regulation 2018/1718³ on the location of the seat of EMA, Directive 2001/83/EC⁴ and Regulations 2019/5⁵, 2019/6⁶ on EMA's role in the authorisation of medicinal products and other applicable Union legislation.

² Regulation (EC) No 726/2004 of the European Parliament and of the Council of 31 March 2004 laying down Community procedures for the authorisation and supervision of medicinal products for human and veterinary use and establishing a European Medicines Agency, OJ L 136 30.4.2004, p. 1 (link available [here](#))

³ Regulation (EU) 2018/1718 of the European Parliament and of the Council of 14 November 2018 amending Regulation (EC) No 726/2004 as regards the location of the seat of the European Medicines Agency, OJ L 291, 16.11.2018, pp. 3–4 (link available [here](#))

⁴ Directive 2001/83/EC of the European Parliament and of the Council of 6 November 2001 on the Community code relating to medicinal products for human use, OJ L 311 28.11.2001, p. 67 (link available [here](#))

⁵ Regulation (EU) 2019/5 of the European Parliament and of the Council of 11 December 2018 amending Regulation (EC) No 726/2004 laying down Community procedures for the authorisation and supervision of medicinal products for human and veterinary use and establishing a European Medicines Agency, Regulation (EC) No 1901/2006 on medicinal products for paediatric use and Directive 2001/83/EC on the Community code relating to medicinal products for human use, OJ L 4, 7.1.2019, pp. 24–42 (link available [here](#))

⁶ Regulation (EU) 2019/6 of the European Parliament and of the Council of 11 December 2018 on veterinary medicinal products and repealing Directive 2001/82/EC, OJ L 4, pp. 43–167 (link available [here](#))

Moreover, the processing of data within the Agency’s AACC system is necessary for the compliance with health and safety standards according to Article 1(e)(2) of the Staff Regulations of Officials of the European Union.⁷

Other EMA internal guidelines, implementing rules and provisions on the processing activities required for the management and functioning of the Agency e.g. security and physical protection measures, mandatory registration of on-site presences, measures to protect information processing facilities, health and safety standards are the following:

- 0076 Security Policy;⁸
- EMA Decision on working time and hybrid working;⁹
- EMA Decision on transfer of access control data from the security access control system;¹⁰
- EMA Decision on contribution towards staff’s commuting costs from their residence in the Netherlands to the EMA office location in Amsterdam as social measure;¹¹
- EMA Decision on the pre-approval of exceptional telework from outside the place of employment.¹²

2.3. Transfer of personal data outside of EU

N/A

3. How long do we keep your data?

Type of data	Retention Period
Personal data (name, surname, personnel number, photo) recorded in the AACC referring to EMA staff, seconded national experts, interims, trainees, contractors and delegates	For the duration of the contract (staff) or the professional engagement with the Agency
Personal data (name, surname, personnel number) extracted from the AACC on the presence in the building of Emergency Response Team members (ERT) and First Aiders	Report is automatically overwritten in the system every calendar week; For the transfer of the report, we refer to EMA’s Data protection notice on Microsoft Applications ¹³
Names and movements of all persons present in the building	6 months from last day in the building
Report (name, surname, personnel number) extracted from the AACC on the verified presence	We refer to EMA’s Data protection notice on Microsoft Applications

⁷ Regulation No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community, OJ P 045 14.6.1962, p. 1385 (link available [here](#))

⁸ Security Policy 0076 EMA/1016/2023

⁹ European Medicines Agency Decision of 21 March on working time and hybrid working EMA/MB/426360/2023

¹⁰ Decision of the Executive Director on transfer of access control data from the security access control system EMA/543034/2024

¹¹ Decision of the Executive Director on EMA contribution towards staff’s daily commuting costs from their residence in the Netherlands to the EMA office location in Amsterdam as social measure, EMA/596278/2024

¹² Decision of the Executive Director on the pre-approval of exceptional telework from outside the place of employment EMA/239672/2025

¹³ European Medicines Agency’s Data Protection Notice for the use of Microsoft Applications: OneDrive, Outlook 365, Teams and SharePoint EMA/188185/2023 Rev.1 (link available [here](#))

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

AACC data is accessed and processed on a need-to-know basis by:

- dedicated EMA staff members from the facilities support services, as well as contractors within the security and reception services responsible for enrolling and processing staff, delegates, contractors, and issuing visitor access cards;
- dedicated 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;
- the EMA Health & Security Officer and First Aid coordinator. The report of the AACC system they receive contains personal data referring only to Emergency Response Team members (ERT) and First Aiders and it is used for operational and statistical purposes of this team.
- dedicated members of the Staff Matters service. The report from the AACC system is received on a quarterly basis to calculate the contribution towards staff commuting costs;
- the Head of the A-Division. The report from the AACC system is necessary for evaluating the physical presence in the Agency building in the context of carrying out ex-post controls to monitor compliance with weekly presence and for general statistical purposes in accordance with EMA working time and hybrid working rules¹⁴;
- the Head of Staff Relations and Support department may also grant access to line managers of the data subjects in the lists, for the correct implementation of trust-based management in cases of differentiated determination of working hours of their staff¹⁵;
- the Head of Service or Office of the officially appointed contract managers (of the processors) or to the Central Information Office of the I-Division, for the purpose of verifying the physical presence in the building of contractors where the applicable contract requires physical presence in the building or if the contract specifies that *intra-muros* ('on-site') rates apply and verification is necessary to process the payment of services to the contractor;
- other EMA managers may also be given access to the access control data when requested in the framework of administrative enquiries or disciplinary procedures following a formally established process where the data subject must be informed;
- the Executive Director and Assistants to Executive Director, the Deputy Executive Director, the Internal Audit Service, the Legal Department, the Data Protection Officer (DPO);
- national law enforcement authorities or DG Security of the European Commission upon written request and duly authorized by the data controller in case of crime prevention or investigations regarding threats to EMA security.

The contractors responsible for the technical maintenance of the access control system have access to all the system components, including data, exclusively for maintenance purpose.

¹⁴ European Medicines Agency Decision of 21 March on working time and hybrid working EMA/MB/426360/2023

¹⁵ Ibid Article 5.4

Additionally, when hardware must be replaced due to end of lifespan or fault, these contractors need to copy data to the new piece of hardware installed in the system. This process is always overseen by EMA security staff, it is done in the EMA building, using EMA approved hardware and it is not possible to access the data remotely as neither the old nor the new hardware are connected to the internet and/or cloud in any form.

Requests for access to documents under the provisions of Regulation 1049/2001¹⁶ are handled under EMA's relevant Privacy Statement concerning requests for information or access to documents¹⁷.

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:

- 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.

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.
- **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 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 general EMA Data Protection and Privacy policy, hosted at [Data protection and privacy at EMA | European Medicines Agency \(EMA\)](#)
- **Right to object** – You have the right to object at any time to this processing on grounds related to your particular situation.

¹⁶ Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents (link available [here](#))

¹⁷ European Medicines Agency's Privacy Statement concerning requests for information or access to documents EMA/415481/2019 Rev.2 (link available [here](#))

The rights of the data subject can be exercised in accordance with the provisions of the Regulation. For anything that is not specifically provided for in this data protection notice, please refer to the contents of the general EMA Data Protection and Privacy policy: [Data protection and privacy at EMA | European Medicines Agency \(EMA\)](#)

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 Data Protection and Privacy policy, please contact the **Data Controller** at datacontroller.administration@ema.europa.eu or the **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