17 November 2026
EMA/47432/2021

Record of data processing activity in the context of Workstation Ergonomics in the context of Health & Safety of staff and contractors (public)

1.	Last update of this record, version number:	17 November 2026 version 4
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)	**Processor**: **Laboritas B.V.** **Activity**: • 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 advice or recommendations for additional support/equipment; • Record actions undertaken; **Contact Details**: Europalaan 16, 2408 BG Alphen aan den Rijn-the Netherlands ema@laboritas.nl

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			• Record of the outcome of an individual case.	
		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
7.	Purpose of the processing	The assessments and trainings are part of the Agency's compliance with Dutch Health & Safety requirements, and may include: • Information and training on ergonomic matters in line with Dutch Health & Safety requirements; • 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 on-site or teleworking conditions; • Preparation for the appointment for workstation ergonomics/DSE assessment.			
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, using the Intranet and are also users of DSE e.g. laptops, computers, while performing the Agency's tasks. The assessments and trainings 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 and organisational entity (for booking individual assessment appointments); • Date and time of the appointment for the workstation/DSE assessment; • Individual feedback that may include health-related data to the assessor; • Health-related data requested by the assessor from the Occupational Health Physician to support claims regarding occupational health assessment and amendments and future reviews of Reasonable Accommodation decisions; • Personal data collected via a dedicated questionnaire on the workstation by the ergonomics risk assessor (a contractor or a member of Staff Relations and Support, Facilities Support and Staff Matters); • Personal data related to ergonomic equipment provided to the staff member, including details of the current equipment and adjustments (e.g. chair settings) made during an assessor visit or the supply of new equipment for any non-standard aids (e.g. cushion or wrist rest),			

<table>
<tr><td></td><td></td><td>furniture (e.g. different type of chair, foot support), or IT equipment (e.g. ergonomic mouse or keyboard).</td></tr>
<tr><td>9.</td><td>Time limit for keeping the data</td><td>
<table>
<tr><th>Type of data</th><th>Retention Period</th></tr>
<tr><td>– training records;
– ergonomic assessments;
– appointments for DSE assessments;
– confirmation of participation in the DSE assessment.</td><td>During employment: 10 years from the end of the year of completion;
After the end of employment, provided that 10 years have not yet elapsed since 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.[1]</td></tr>
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<tr><td>10.</td><td>Recipients of the data</td><td>The data collected will be processed internally by dedicated staff members within 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 dedicated staff members of 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 in cases of legal obligations to do so.

The appointments to the DSE assessment are accessible only to the person performing the DSE during the session and the dedicated EMA staff members from EMA Administration and Corporate Management Division that coordinate the procedure. In particular, only the dedicated staff member(s) and nominated contractors coordinating the project have password protected access to data, which does not contain any health information.

Additionally, 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:
• 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);</td></tr>
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[1] Autoriteit Persoonsgegevens, Role of the occupational health and safety service or company doctor regarding sick employees (link available here)

		• the Office for the Administration and Payment of Individual Entitlements - Paymaster Office (PMO) from the European Commission; • the European Ombudsman; • the Court of Justice of the EU; • the European Court of Auditors; • the Internal Audit Service (IAS) of the European Commission; • the European Public Prosecutor's Office (EPPO); • 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, which does not contain 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.