



23 January 2023  
EMA/112992/2022

## Records of data processing activity (public) for the pilot use of 360o Interactive Video Training Platform

1.	Last update of this record, version number:	New record version 1
2.	Reference number:	A44
3.	Name and contact details of controller:	Head of Administration and Corporate Management Division <a href="mailto:datacontroller.administration@ema.europa.eu">datacontroller.administration@ema.europa.eu</a>
4.	Name and contact details of DPO:	<a href="mailto:dataprotection@ema.europa.eu">dataprotection@ema.europa.eu</a>
5.	Name and contact details of joint controller (where applicable)	N/A
6.	Name and contact details of processor (where applicable)	Warp VR Van Nelleweg 1, Expeditiegebouw, 3044 BC Rotterdam The Netherlands Email: <a href="mailto:hello@warpvr.com">hello@warpvr.com</a> Phone: +31 85 130 3616
7.	Purpose of the processing	<p>The purpose of processing these data is to delivery training using an innovative and immersive virtual reality platform (Interactive 360<sup>o</sup> video software, Warp Studio) to strengthen awareness and knowledge retention in the areas of cybersecurity resilience, health and safety and security. In the context of the Agency's learning management, the main reasons for the adoption of this training solution are to improve:</p> <ul style="list-style-type: none"><li>• Compliance and cybersecurity resilience in line with Security Policy POLICY/0076 and the Internal Guidance on Security Policy.</li><li>• Compliance with respect to health and safety and security in line with Health and Safety POLICY/0004.</li></ul>

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8.	Description of categories of persons whose data EMA processes and list of data categories	EMA staff members (temporary agents, contract agents, interims, trainees) in active employment and EMA contractors who subscribe to a course in the EMA Talent Hub and where the training is held on-line using the Warp Studio cloud platform.
9.	Time limit for keeping the data	<p>Personal data in Warp Studio are kept for six months from the date the training session is completed. This is to allow for yearly reporting and to streamline the deletion of personal data where they are no longer required.</p> <p>Personal data for training sessions delivered using Warp Studio are kept in accordance with the timelines set out in the Data Protection Notice of the EMA Talent Hub<sup>1</sup>, i.e., data are maintained for as long as the staff member is in active service and are destroyed three years after the staff member terminated that service.</p>
10.	Recipients of the data	<p>The personal data stored in Warp Studio are accessed by EMA staff members designated as system administrators by EMA's business area and who because of their role receive permission to sign into Warp Studio. Given it is a cloud solution, senior developers and the management team in Warp Studio may access, too. The use of Google Analytics Monitoring has been disabled based on the request of the Agency.</p> <p>The personal data stored at the EMA Talent Hub relating to the training (specified at the point 2.1) are accessed as set out in the corresponding Data Protection Notice i.e., by the staff, their line manager(s) and by the competency development team.</p>
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.	System administrators for each EMA's business area receive special permissions to access Warp Studio.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	<p>The "<a href="#">Data protection notice for training using virtual reality (EMA/75747/2022)</a>" is available from the intranet website from this page: <a href="#">Processing of EMA colleagues' personal data</a></p> <p>Warp VR's users' privacy terms are communicated in their privacy information<sup>2</sup>, which includes a list of sub-processors.</p>

<sup>1</sup> [Privacy statement Talent Management EMA/505012/2020](#)

<sup>2</sup> [Warp VR - GDPR Compliance - v1.1.pdf](#)