

Case No: 80285  
Document No: 880498

## PRIVACY STATEMENT – NEW STARTERS, STAFF AND LEAVERS

In exercising its tasks, the EFTA Surveillance Authority (hereinafter: ESA) is committed to pursuing a high level of data protection in accordance with the rules it has adopted for that purpose in its Decision 235/16/COL.<sup>1</sup> This statement provides an overview of how ESA ensures the protection of personal data of its staff on taking up their new position (“starters”), during their contractual period (“staff”) and at the time of their leaving ESA (“leavers”). It also sets out which rights persons submitting personal data in that context have. For more detailed information in this regard, reference is made to the Decision mentioned above. The terms “starters”, “staff” and “leavers” refer to College Members, Staff, Trainees and Seconded National Experts as a whole.

### **What is the purpose of the data collection?**

The purpose of the collection of personal data is the administration of starters, staff and leavers. The data is collected under the responsibility of HR and Finance.

### **What personal data do we collect?**

The following personal data is collected and further processed from *new starters, staff and leavers*:

- Personal identity: title, civil status, nationality, gender, data contained on ID card/passport/official documents such as marriage certificates, place of birth, date of birth.
- Contact details: address at home station, address at duty station, address after departure, private phone number, work phone number.
- Bank account details, currency choice for savings fund account, rental costs and contract expiry date.
- Personal data required to administer employment and fulfil obligations arising from ESA’s internal Regulations, Policies and Procedures.

The following personal data is collected from *spouse/partner/child*:

- Personal identity: name, address, gender, date of birth, relationship, data contained on ID card/passport/official documents such as marriage certificates.
- Employment situation: income and employer.

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<sup>1</sup> EFTA Surveillance Authority Decision of 15 December 2016 laying down Rules on Data Protection, Decision No 235/16/COL.

- Confirmation if dependent child is disabled, child allowances paid from other sources.

For the processing of special ID cards for a dependent *spouse/partner/child* additional information is requested:

- Personal identity: previous address(es), actual address, nationality, place of birth, civil status, date of arrival in Belgium,
- Employment situation: confirmation of whether undertaking professional activities Belgium and if so, what activities.

The following personal data is collected from *emergency contacts*:

- Personal identity: name, date of birth, relation to the staff member, nationality.
- Contact information: phone number.

The following personal data is collected from *beneficiaries*:

- Personal identity: name, date of birth, relation to the staff member.
- Percentage share of benefits.

### **Who has access to your information and to whom is it disclosed?**

Access to personal data stored at ESA is restricted to HR, Finance and your manager(s) on a day to day basis.

As an employee of ESA your personal data may be transferred to the following recipients: Finance, HR, Director of Administration, manager(s), internal or external legal advisers, College Members, Belgian Protocol Service (to enable them to issue special ID cards), an external printing company (for business cards), European Commission DG HR & Security (access cards for Commission canteens), Allianz (life, disability and health insurance), DNB Luxembourg SA (staff member savings fund), Baker Tilly Belgium (external auditors).

### **How do we protect and safeguard your information?**

Personal data stored in hard copy by HR is kept in secured cabinets, access to which is restricted to authorised HR and Finance personnel, and, upon request, the staff member in question and their manager(s). Personal data stored in the internal document management system is likewise access restricted to authorised personnel and to staff members in respect of their own file. Financial data is stored in internal HR and Finance databases/systems, all of which are access restricted.

### **How can you verify the accuracy of your personal data and, if necessary, correct it?**

You have the right to access the personal data ESA has collected about you, and to be informed about the purpose of its collection. You can view your personal data and edit some data in the online recruitment system, or request that HR modify or update your

data. In certain instances, you have the right to block data from being processed or have it erased (see article 15 and article 16 of the Decision).

### **How long does ESA keep your data?**

ESA stores personal data for varying lengths of time, depending on the reasons for which the data is collected and used, as set out in the relevant Data Protection Notifications.

Former staff members are often required to provide proof of earnings, insurance coverage, savings fund contributions and/or employment dates in order to access national benefits, such as health insurance and pensions entitlements. This may be shortly after their departure or a significant period of time afterwards. Therefore relevant personal data is retained for 50 years in the document management system or empower and not anonymised. In addition, the hard and/or electronic copies of an individual's employment contract, contract variations and notice letters are retained on their HR personal file for 50 years.

### **Contact Information**

Should you have any question or request concerning the information submitted or on your rights, feel free to contact ESA's Data Protection Officer by sending an email to **[dpo@eftasurv.int](mailto:dpo@eftasurv.int)**

### **Recourse**

Complaints, or questions, can be addressed to the Data Protection Officer or the European Data Protection Supervisor. All details can be found on the following website <http://www.edps.europa.eu/EDPSWEB> .

*Data subjects have the right of access to personal data being processed by the EFTA Surveillance Authority, and the rights set out under Section 5 of College Decision No 235/16/COL (including the rectification, blocking or erasure of those data, as well as the right of notification and the right to object). A data subject access request form can be found at [www.eftasurv.int/data-protection](http://www.eftasurv.int/data-protection).*