

**EMCDDA Personal Data Protection Record on  
EMCDDA POLICY OF DIGNITY AND RESPECT**

**Part 1 - mandatory records under Article 31 of the new rules (publicly available)**

Nr.	Item	
<b>Header - versioning and reference numbers (recommendation: publicly available)</b>		
1.	Last update of this record	19-9-2019
2.	Reference number:	DPO-002
<b>Part 1 - Article 31 Record</b>		
3.	Name and contact details of controller	Controller: EMCDDA Praça Europa 1, 1249-289 Lisboa, Portugal Contact: Mr Dante Storti Head of ADM unit <a href="mailto:EMCDDA-HR@emcdda.europa.eu">EMCDDA-HR@emcdda.europa.eu</a>
4.	Name and contact details of DPO	Mr. Ignacio Vázquez Moliní, DPO, EMCDDA dpo@emcdda.europa.eu
5.	Name and contact details of joint controller (where applicable)	n.a.
6.	Name and contact details of processor (where applicable)	n.a.
7.	Purpose of the processing	The purpose of the processing is exclusively within the scope of facilitating the dealing with cases of mistreatment (among them sexual and moral harassment). Data is collected to facilitate the resolution of difficult cases that may arise in the framework of the working relations.
8.	Description of categories of persons whose data EMCDDA processes and list of data categories	Categories of persons whose data EMCDDA processes: Officials, temporary agents, contract agents, Seconded National Experts (SNEs), interims, trainees or others. The categories of personal data dealt with for dealing with a case of mistreatment are the following: Data to identify and contact the alleged victim, the alleged mistreater and possible witnesses: family name, name, date of birth, gender, nationality, private address, e-mail address, unit, phone numbers; Description of the problem/conflict/situation; The notes taken by the confidential counsellor; The kind of intervention/action foreseen/taken; History of potential transfers; Declarations from witnesses, any kind of paper documentation available to support the facts.

9.	Time limit for keeping the data	<p>Data regarding cases will be kept for five years or to cover the exhaustion of the period in which a complaint upon Article 90 of the Staff Regulations is subject to be introduced and, should this happen, data will be kept up to the moment the potential legal proceedings are finalised (procedures in front of the Civil Administrative Tribunal, the ECJ, etc.).</p> <p>Data kept for statistical purposes (only total number of cases dealt with per year); in line with <i>Article 4(1)(b) of Regulation (EU) 2018/1725</i>, will be kept anonymously.</p>
10.	Recipients of the data	<p>The recipients of the data are:</p> <p>For the informal procedure: the confidential counsellor chosen by the person concerned or the company doctor if so decided. The appointing authority (the Director), in the capacity of ultimate responsible for human resources matters. Last but not least, the Human Resources designated staff dealing with the case.</p> <p>For the formal procedure: the Director in the capacity of ultimate responsible for human resources matters and to decide on the next steps to be taken. In case an inquiry is open, the persons in charge of carrying out the inquiry and the staff of the EMCDDA legal service. Last but not least, any of the supervisory instances of the EMCDDA (i.e. European Court of Auditors, Internal Audit Service, and potentially, the Civil Service Tribunal, the ECJ, and the staff of the Ombudsman, etc.).</p>
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No
12.	General description of security measures, where possible.	<p>To guarantee security of confidential data, all written exchanges are handled in hard copy in sealed envelopes marked 'Staff matter and confidential' and are delivered by hand. The files containing paper documents are kept by the confidential counsellors in locked cupboards within her/his office or with the company doctor.</p> <p>Electronic documents are kept in specific drives only accessible to the persons concerned, Head of HRMS and the person in charge of supporting the case administratively within HR and will in no case be accessible to third parties.</p> <p>Any data regarding the formal procedure will be treated confidentially within the HRMS and accessible only to the staff dealing with the case and with legal matters at the EMCDDA</p>
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	Privacy statement