

## PRIVACY STATEMENT

### relating to the protection of personal data related with “Windflower – EDA Public Transportation Contribution Scheme”

#### 1. INTRODUCTION

This Privacy Statement describes the processing operations identified as the “EDA Public Transportation Contribution Scheme” and the relevant application “Windflower”. This processing requires the handling of personal data.

EDA protects the fundamental rights and freedoms of persons and in particular their right to privacy with respect to the processing of personal data in accordance with (Article 1.1 of Regulation No 2018/1725).

#### 2. CONTROLLER OF THE PROCESSING OPERATION

European Defence Agency  
Rue des Drapiers 17-23  
B-1050 Brussels  
[www.eda.europa.eu](http://www.eda.europa.eu)

#### 3. PURPOSE OF THE PROCESSING

The application called “Windflower” has been developed in order to support the EDA public transportation contribution scheme allowing staff members to enrol and request reimbursements. It helps the authorised staff to handle the files and create the relevant payment orders.

#### 4. DATA PROCESSED

Interested staff members are requested to upload in “Windflower” a scanned copy of their public transportation card and season tickets. The data collected concern name and surname, user ID and username, picture (if visible on submitted documents), personnel number, contract type, contract start date and contract end date, unit, office, phone, email and private address.

A paper file is created, too by printing the uploaded documentation.

#### 5. RECIPIENTS OF THE DATA

Access to the system Windflower is limited to:

1. EDA staff members entering their request for reimbursement (only access to their own file);
2. Authorised HR staff in charge of validating all requests (same staff in charge of HR files);

3. Finance Unit team in charge of payments (same staff in charge of salaries and related payments);
  4. The IT team in charge of the maintenance of the web application.
- In addition, some personal data may be disclosed, in compliance with the relevant current legislation and established case law, and provided that it is justified to:
1. The General Court, at its request;
  2. The European Ombudsman, at its request;
  3. The European Data Protection Supervisor, at its request;
  4. The audit and control bodies such as OLAF, Court of Auditors, EDA Internal Audit, the Internal Audit Service.

## **6. PROTECTION AND SAFEGUARDING OF THE DATA**

The ECAS authentication system is used for accessing Windflower and the data collected are only accessible to authorised agents.

Restricted access to Windflower application and database are granted and monitored by the Local System Administrator upon instruction and authorisation of the responsible hierarchy. The same rules apply for the Finance agents.

The paper files are kept in locked archives. When circulating paper files, confidentiality markers are used.

## **7. RIGHT OF ACCESS AND RECTIFICATION OF THE DATA**

In order to access or correct any inaccurate personal data, you should send a request to the controller of the processing, the Human Resources Unit in EDA by sending an email to [edahtransport@eda.europa.eu](mailto:edahtransport@eda.europa.eu).

## **8. TIME LIMIT FOR STORING DATA**

The data stored in Windflower are kept for a maximum period of 5 years from the date in which the agent leaves the institution, as the relevant paper file. If a staff member quits the public transportation contribution scheme or the Agency, electronic data is kept for 2 years but the rule of 5 years retention is maintained for the paper file.

## **9. LEGAL BASIS FOR THE PROCESSING OPERATION**

- Article 5(d) of Regulation 2018/1725;
- Article 31 of Council Decision (CFSP) 2015/1835 of 12 October 2015 defining the statute, seat and operational rules of the European Defence Agency;
- Memorandum of Understanding between EDA and ERCEA including Annexe;
- The General Conditions of Enrolment to the EDA Public Transport Contribution Scheme.

## **10. CONTACT DPO**

In case you have any questions or queries concerning data protection at the European Defence Agency, you can also contact the Data Protection Officer at [dataprotection@eda.europa.eu](mailto:dataprotection@eda.europa.eu).

## **11. RECOURSE TO EDPS**

As a data subject you have the right to have recourse at any time to the European Data Protection Supervisor (<http://www.edps.europa.eu>) at [edps@edps.europa.eu](mailto:edps@edps.europa.eu).

## 12. ADDITIONAL INFORMATION

More information on Data Protection at the European Defence Agency can be obtained on our public website <https://www.eda.europa.eu/Aboutus/how-we-work/data-protection>.