

PRIVACY NOTICE – Use of professional staff photos 71

Use of professional staff photos involves processing of personal data, which shall comply with Regulation (EU) N° 2018/1725¹ (the “Regulation”).

This data protection notice explains how the Single European Sky ATM Research 3 Joint Undertaking (here after referred to as SESAR 3 JU) uses any information you give to us, and the way we protect your privacy. Furthermore, it describes the rights you have as a data subject and how you can exercise these rights.

SESAR 3 JU protects the fundamental rights and freedoms of natural persons and in particular their right to privacy with respect to the processing of personal data.

We provide the following information based on Articles 14 to 16 of the Regulation.

What is the purpose of the processing?

The purpose of the data processing is to use the professional photos taken to SESAR 3 JU staff member (including certain external contractors) for providing a closer approach to the activities of the SESAR 3 JU. In particular, for the following dissemination activities:

- I. Publication of individual pictures in the SESAR 3 JU Directory (intranet)
- II. Publication of group pictures in internal news items (intranet)
- III. Inclusion (of both individual and group pictures) in slides/other material presenting the SESAR 3 JU (and activities), both internal and external publication
- IV. Social media (e.g. announcement of a speaker at an event (individual picture), promoting the team or SESAR 3 JU as a whole (group picture)

Which personal data do we process?

Individual and group photos, racial or ethnic origin could be revealed through the photo.

Why do we process your personal data and under what legal basis?

Personal data processing is based on freely given, specific, informed and unambiguous consent of the data subject.

Who is the controller and other actors involved in the processing?

Controller: The SESAR 3 JU, legally represented by Andreas Boschen, Rue de la Fusée 96, 1130 Brussels.

Processors:

- Photographer is EU TURN, under framework contract for *strategy, editorial, media, press and publications*. Privacy policy available [here](#)
- Content manager, as part of the EAC team, processes the consent forms under framework contract for *Web-Services*. Privacy policy available [here](#)

How is SESAR 3 JU processing the personal data?

See <https://www.sesarju.eu/dataprotection> for more information.

¹ Regulation (EU) N° 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (“EUDPR”).

How do we protect and safeguard your information?

- Staff dealing with this processing operation is designated on a need-to-know basis
- Access control and technical measures such as physical locks and/or secure connections and firewalls
- Obligation of confidentiality of the staff
- Standard clause for the processing of personal data included in the contract
- Secure transfer of data
- Confidentiality of communications and privacy
- No copies kept by contractor
- Secure communication channel between server and client

Who can access to your personal data and to whom is it disclosed?

- The following might have access to your personal data:
- All data subjects included in the pictures (individual and group)
- External Affairs and Communications team
- Data processors (external contractors)

What are your rights and how can you exercise them?

You have the right of access to your personal data and to relevant information concerning how we use it. You have the right to rectify your personal data. Under certain conditions, you have the right to ask that we delete your personal data or restrict its use. You have the right to object to our processing of your personal data, on grounds relating to your particular situation, at any time. In addition, you have the right not to be subject to a decision based solely on automated processing of data, including profiling, if such decision has legal effect on him or her, except for certain situations, such as entering into a contract (as required by articles 14-16 & 24 of EU DPR Regulation).

Information on action taken on the data subject's request to exercise her/his rights shall be provided without undue delay and in any case within one month of receipt of the request. In case of complex or voluminous requests, this period may be extended by another two months, in which case the JU will inform the data subject.

The content of these rights is detailed in the [Data Protection Notice page in SESAR 3 JU website](#) which contains also information about the contact points and recourse (see dedicated point below).

How to withdraw your consent and the consequences of doing this

Data subjects have the right to withdraw their consent at any time by sending a written request to communications@sesarju.eu. Please note that withdrawing your consent does not affect the lawfulness of any processing based on your consent before this consent is withdrawn.

Could your rights be restricted in very exceptional circumstances?

Possible restrictions to data subject's rights may apply as foreseen in Article 25 of the Regulation, as laid down in Decision GB(D)06-2021 on *Internal rules concerning the restrictions of certain rights of data subjects in the framework of the functioning of the SESAR 3 JU*, available in the [Official Journal](#) in all EU languages.

How long is the data retained?

The files are kept ensuring institutional memory of the organisation until:

- Requested to be deleted
- New pictures are taken
- A data subject leaves the SESAR 3 JU

- End of the SESAR 3 JU mandate (31 December 2029)

Complaints, concerns and recourse

Should you have any complaint or concern you may contact:

- the Data Protection Officer of the SESAR 3 JU at sju.data-protection@sesarju.eu, *and*
- the external affairs and communications team (EAC team) at communications@sesarju.eu.

In addition, as a data subject, you have a right to recourse to the [European Data Protection Supervisor](#) (EDPS) at any time by e-mail to edps@edps.europa.eu or a letter to the EDPS postal address marked for the attention of the EDPS: European Data Protection Supervisor, Rue Wiertz 60, B-1047 Brussels, Belgium.