

## SPECIFIC PRIVACY NOTICE – *Internal survey(s) functionality*

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*The internal survey functionality involves processing of personal data, which complies with Regulation (EU) N° 2018/1725<sup>1</sup> (the “Regulation”).*

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

Staff surveys are conducted through the IDMS survey functionality. IDMS is the share point based system that the SJU uses for document management purposes.

The main purpose of the survey is to collect in an anonymous way information, opinions, user experience from colleagues on any matter of interest to the SJU or impacting the strategic objectives of the SJU (e.g.: use of IDMS , risk management process, etc...).

### **Which kind of personal information is collected?**

The following personal data are collected for the purpose of conducting the survey:

- Identification data of the respondents necessary to use of the IDMS platform, as well as their opinions;
- Opinions or answers provided by the respondents to the questions of the survey could constitute personal data if such opinions may:
  - hint the identity of the respondent
  - refer to persons or individual functions

### **What is the legal basis of the processing?**

Article 5 (1) of the Regulation, processing is necessary for the performance of a task carried out in the public interest on the basis or in the exercise of official authority vested in the Union institution or body.

### **Actors in the data collection**

- Controller: The SESAR JU and its Chief Executive directors  
The relevant Chief at the SJU whose team is launching the survey

### **How is SJU processing the personal data?**

The data collected is processed both electronically and manually.

When processing electronically, though I-DMS using the survey tool through the following process:

- The link to the survey is sent to respondents (data subjects) via e-mail with 7-10 days to provide answers on a voluntary basis. After the period, the survey cannot be responded to, (which is not managed automatically but through a transaction of the System Administrator (e.g. setting the corresponding page to Read-only) upon instruction of the responsible Team.

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<sup>1</sup> 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 (“regulation 1725”).

- Any respondent can use the link to get access to the questionnaire via the I-DMS. The survey is also directly accessible through the I-DMS navigation bar Living Together -> Surveys. Permissions and accessed are controlled through the standard I-DMS permission management system.

When processing electronically, aggregated data may be (depending on the type of survey):

- Collected and extracted to an excel file at the date set by the Responsible team corresponding to the end of the survey period. The excel file is stored by both the colleague at the responsible team.
- Initially analysed by the responsible team.
- Clustered and re-arrange to come up with quantitative information and group free text answers.

The Corporate Management Team may be provided with a synthesis from that analysis.

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

The survey is anonymous; identification of the respondent is possible only if she or he deliberately provides information that would allow for identification.

Then each section of the IDMS can be further defined, either by granting additional rights (to add and/or modify and/or delete data) or by restricting access to certain categories of people.

The IDMS survey functionality of giving access to previous answers and names of authors is deactivated.

Results of the survey will be stored in the restricted working space of the responsible team. In any case the personal opinion of the respondents will not be disclosed.

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

The results of the survey will be available only to the Responsible team. The Corporate Management Team may be (depending of the survey at stake) provided with a synthesis and will develop a new risk mapping starting from that analysis.

As conducted through the I-DMS tool, other users such as ICT support team (located in the SJU premises and with ICT service desk), EUROCONTROL IT Service Desk Team or the MCS support team also have technical access to the database.

### What are your rights and how can you exercise them?

The procedure to grant rights to data subjects includes:

- Access to the DPO's register of data processing operations;
- Requests from data subjects to the Data Controller to exercise their rights; as well as
- Detailed procedures to exercise the rights to **access, rectify, erase, block, object, notify to third parties of any rectification, erasure or blocking and not to be subject to automated decision making**. The content of these rights is detailed in the Data Protection Notice page in SJU website, which contain also information about the contact points and recourse (including EDPS <http://www.edps.europa.eu> and [edps@edps.europa.eu](mailto:edps@edps.europa.eu), and SJU DPO [sju.data-protection@sesarju.eu](mailto:sju.data-protection@sesarju.eu)) as well as detailed information on the exercise of the rights and information on possible restrictions.



*Possible restrictions as laid down in Article 25 of the Regulation can apply.*

### **For how long the data is retained?**

The SJU only keeps the data for the time necessary to fulfil the purpose of collection and further processing. It will be deleted once the survey is closed and the results of the survey have been aggregated.

### **Complaints, concerns and recourse**

Should you have any complaint or concern you may contact:

- the data protection officer of the SJU: [sju.data-protection@sesarju.eu](mailto:sju.data-protection@sesarju.eu), and
- The relevant Chief whose team is conducting the survey.

In addition, as a data subject, you have a right to recourse to the European Data Protection Supervisor (EDPS) at any time [edps@edps.europa.eu](mailto:edps@edps.europa.eu)