



21 July 2023
EMA/391331/2023

Records of data processing activity relating to the reasonable accommodation request process

1.	Last update of this record, version number:	21 July 2023, version 1
2.	Reference number:	A60
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of Administration and Corporate Management Division datacontroller.administration@ema.europa.eu
4.	Name and contact details of DPO:	dataprotection@ema.europa.eu
5.	Name and contact details of joint controller (where applicable)	Not applicable
6.	Name and contact details of processor (where applicable)	Not applicable
7.	Purpose of the processing	<p>The legal basis to carry out the processing of documents related to limitations due to disability is found in Article 1(d)4 of the Staff Rules Regulations. Processing of personal data is necessary to:</p> <ul style="list-style-type: none">• to enable the external medical officer to receive confidential medical documents/information from EMA staff members related to their disability.• to enable the designated Disability Focal Point and other relevant actors involved in the reasonable accommodation decision making process to receive documents/information from EMA staff members related to their needs in the workplace to overcome the limitations of the disability.



8.	Description of categories of persons whose data EMA processes and list of data categories	<p>The following categories of data subjects are subject to this processing operation:</p> <ul style="list-style-type: none"> • Active temporary and contract agents <p>The following categories of personal data are collected for this processing operation:</p> <ul style="list-style-type: none"> • Staff member's name and surname; • Date of birth; • Personnel number; • Organisational entity to which one belongs; • Job role and description; • Start and end date of contract; • EMA email and extension line; • Personal email and telephone number; • Home address in case a reasonable accommodation is granted for teleworking from home; • Declared need for a reasonable accommodation for a workplace limitation due to a disability; • In addition, the Agency will process the opinion of the occupational health physician e.g. the validation of disability.
9.	Time limit for keeping the data	<p>Data is accessed through EMA's HR database where it is retained for the entire duration of employment at the Agency, after which the data is deleted. Once a staff member has left the Agency, their data is retained for 2 years after which their complete profile and all data is deleted. Where a staff member leaves due to a labour dispute or a legal action, their data may be retained for longer than the 2-year deadline after employment, if the matter has not been resolved.</p> <p>In accordance with its legal obligations, EMA shall keep the staff member's name and the workplace adjustment linked to the disability record on the supporting financial documentation for 5 years from the date of budget discharge. Accordingly, EMA will delete the staff member's name and date of birth kept in the financial documentation no later than within 8 years following the receipt of the disability assessment.</p>
10.	Recipients of the data	External medical officer and restricted staff within the EMA Administration and Corporate Management Division or Information Management Division
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	Not applicable
12.	General description of security measures, where possible.	The Agency has appropriate technical and organisational measures in place, including organisational policies, to safeguard the security of personal data and ensure the confidentiality, integrity and availability of the relevant systems, services and the personal data processed within them. In particular,

		<ul style="list-style-type: none"> • Paper copies are not being produced. • Electronic copies can be accessed only through PC password.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	<p>Details concerning the processing of your personal data are available on the Agency's website at: https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement, where you may find the EMA General Privacy Statement as well as the privacy statements on specific data processing operations.</p>