

SPECIFIC PRIVACY STATEMENT

regarding the processing of personal data related to manual contact tracing for COVID-19

What is the purpose of the collection of personal data?

If the symptoms appear at work, or work has been performed from the office recently, ECHA staff members are requested to inform the ECHA medical advisor, the HR unit and their line manager of a suspected case or when diagnosed with the Covid-19 virus and provide a list of colleagues with whom they were in close contact, in order to facilitate manual contact tracing.

What is the legal basis for processing your personal data?

The legal basis for the processing of special categories of personal data for the manual contact tracing of staff and members of the staff's household can be found in Article 10(2)(b) and 10(2)(h) of Regulation (EU) 2018/1725. The provisions of Article 59 of the Staff Regulation related to the management of medical leave is the relevant legal ground for the processing of COVID-19 medical information by the medical advisor of the Agency.

The legal basis for informing a non-staff person that he or she may have been in contact with an individual who has been found to be infected can be found in Article 1(e)(2) of the Staff Regulations supplemented with the Executive Director decision on "Guidelines for resuming activities in the ECHA premises following COVID-19 lockdown measures (Phase 1)".

What personal data is collected?

The data collected shall include name, the confirmation of a Covid-19 virus infection (medical data) and a list of colleagues with whom they were in close contact.

To facilitate the manual contact tracing, the regular visitor log and access control logs may be used.

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

The data collected will be provided to the medical advisor and an absolute minimum of persons involved in the process of manual contact tracing, which includes, as appropriate, the line manager, the wellbeing team of the HR unit and the security staff.

Where necessary, this information might be legitimately transmitted to national health authorities.

Who is the data controller?

The Head of Unit Human Resources shall exercise the tasks of the data controller for the purpose of this processing operation.

How long are your personal data kept and how are they protected?

The non-anonymised data related to a COVID-19 infection will be stored for a maximum of 14 days in order to trace possible exposure to other persons. After that only anonymised data may be kept longer for statistical purposes.

ECHA's IT systems are protected by the IT security measures implemented by the Agency that ensure an adequate security level as concerns threats to electronic assets integrity, confidentiality and availability. Physical files are stored in locked cupboard with restricted access for dedicated staff within the HR unit.

What are your rights?

Any person concerned has the right to be informed about the processing of his/her personal data and is entitled to access and rectify the data collected. Under certain conditions, a right to erasure, restriction, objection and/or data portability also applies.

To exercise the above mentioned rights, contact the data controller at hr@echa.europa.eu.

However, if you feel your Data Protection rights have been breached you can always file a complaint with ECHA's Data Protection Officer (data-protection-officer@echa.europa.eu) or have recourse to the European Data Protection Supervisor.