



## DATA PROTECTION NOTICE

### Pilot Monitoring Exercises: Lessons Learnt Surveys

#### 1. Introduction

The European Union Agency for Asylum (hereinafter 'the EUAA' or 'the Agency') is committed to protecting your privacy. The EUAA collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#)<sup>1</sup> (hereinafter 'the EUDPR').

This Data Protection Notice explains *inter alia* the reasons for the processing of your personal data, the way we collect, handle and ensure protection of your personal data and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, as well as of the Data Protection Officer (DPO) and the European Data Protection Supervisor (EDPS) to which you may have recourse as well to exercise the said rights.

#### 2. Why and how do we process your personal data?

The [Management Board adopted the Decision No 161 of 13 March 2024](#) establishing a common methodology for the monitoring mechanism on the operational and technical application of the Common European Asylum System foresees that the Methodology shall be reviewed with a view to reflect relevant legislative changes and lessons learned from the pilot phase (article 4). Pursuant the [Management Board Decision No 165 of 14 May 2024](#) on the multiannual programme for the period 2026-2030 and the preceding pilot phase for monitoring the operational and technical application of the Common European Asylum System, two pilot exercises shall be conducted exceptionally in 2025, the year preceding the start of the monitoring cycle referred to in Article 1, and shall be considered as an integral part of the first monitoring cycle thus having no impact on the multiannual programme 2026-2030. The Netherlands and Estonia will be the two pilot countries.

The purpose of formal Lessons Learned is to make it possible for the Agency at large to benefit from the experience acquired during pilot monitoring exercises and to capture ideas and recommendations to improve future monitoring exercises.

In this context, we process your personal data in order to collect structured feedback by internal and external stakeholders through Surveys and Feedback Form. Feedback will be collected by:

- EUAA staff involved in different activities for the monitoring exercises;
- the members of the team of experts composed of EUAA staff, Commission representatives, Member State experts and representatives of the United Nations High Commissioner for Refugees (UNHCR');

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<sup>1</sup>. Regulation (EU) 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, OJ L 295, 21.11.2018, p. 39-98.





- personnel and/or non-officials and third parties involved in the monitoring exercise at national level on behalf of the Member State under review.

Data are collected in electronic form, via email and/or use of the EU Survey tool. The EUAA is responsible for the parameterisation and content of EUSurvey and for the processing of personal data collected via the survey. In cases EU Login is used, the European Commission (DIGIT) is the controller for all processing operations related to keeping an EU Login account and to the authentication itself. For more information, please refer to the [EU Login Privacy Statement](#). There is also a controller-processor Data Processing Agreement available [here](#).

All relevant data are stored on the EUAA's Electronic Records and Documents Management System (ERDMS) under a folder classified as 'sensitive' and assigned only to staff members of the Monitoring Unit ('MONU') working on the lessons learned exercise on a need-to-know basis.<sup>2</sup>

### **3. On what legal ground(s) do we process your personal data?**

We process your personal data on the basis of Article 14 of the [Regulation \(EU\) 2021/2303](#)<sup>3</sup> (hereinafter 'the EUAA Regulation') that introduces the monitoring mechanism as well as the [Management Board adopted the Decision No 161 of 13 March 2024](#) establishing a common methodology for the monitoring mechanism on the operational and technical application of the Common European Asylum System foreseeing lessons learned from the pilot phase (article 4) and the [Management Board Decision No 165 of 14 May 2024](#) on the multiannual program for the period 2026-2030 and the preceding pilot phase for monitoring the operational and technical application of the Common European Asylum System, reaffirming that two pilot exercises shall be conducted exceptionally in 2025.

Consequently, the processing operation is lawful under Article 5(1) point (a) of the EUDPR given that it is necessary for the performance of the tasks that the Agency has been vested with for the purpose of fulfilling its mandate by virtue of the EUAA Regulation.

### **4. Which personal data do we collect and further process?**

The surveys are designed to gather feedback on the planning, organisation, and implementation of each monitoring stage. The purpose of the surveys is to identify opportunities for improving future country monitoring exercises. In case your feedback is collected via EU Survey note that the following (categories of) personal data may be processed:

- Employing organisation and/or function/role;
- Country in which the monitoring exercise was performed
- Role/contribution in the monitoring exercise
- Individual feedback, comments and observations you submit in the context of the lessons learnt activity for the pilot monitoring exercises.

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<sup>2</sup> Only those staff granted permission may view content in folders and sub-folders; intended for controlled sharing and storing of confidential documents only.

<sup>3</sup>. Regulation (EU) 2021/2303 of the European Parliament and of the Council of 15 December 2021 on the European Union Agency for Asylum and repealing Regulation (EU) No 439/2010, OJ L 468, 30.12.2021, p. 1-54.



Similar categories of personal data will be processed in feedback collection that will take place over email exchanges.

**5. How long do we keep your personal data?**

Personal data identified in point 4 are kept for one year from the conclusion of the Survey, unless they are deleted at an earlier point in the event that the data controller decides to remove them immediately upon the conclusion of the lessons learnt exercise.

**6. How do we protect and safeguard your personal data?**

All personal data in electronic format (e-mails, documents, etc.) are stored on the servers of the EUAA. In order to protect your personal data, the EUAA has put in place a number of technical and organisational measures as required under Article 33 of the EUDPR. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation. It is noted that the nominations per expert are stored in a sensitive folder in the Electronic Records and Document Management System ('ERDMS') of the Agency where access is limited only to authorized staff of the Monitoring Methodology and Programming Sector ('MMPS').

**7. Who has access to your personal data and to whom are they disclosed?**

The following (categories of) recipients have access to your personal data:

- EUAA staff of the Monitoring Monitoring Unit actively involved in the analysis of the lessons learnt exercise on a need-to-know basis;
- Other EUAA personnel on a need-to-know basis, including personnel of the Information & Communications Technology Unit (ICTU), for security-related purposes;
- The Senior Management Team of the EUAA, and the Management Board of the organisation and the EUAA Monitoring Network in an aggregated and anonymized format.

**8. Do we transfer any of your personal data to third countries or international organisations (outside the EU/EEA)?**

This processing activity does not entail any transfers of personal data to third countries outside the EU/EEA.

**9. Does this processing involve automated decision-making, including profiling?**

This processing activity does not involve automated decision-making, including profiling.

**10. What are your rights and how can you exercise them?**



According to the EUDPR, you are entitled to access your personal data and to rectify them in case the data are inaccurate or incomplete. If your personal data are no longer needed by the EUAA or if the processing operation is unlawful, you have the right to erase your data. Under certain circumstances, such as if you contest the accuracy of the processed data or if you are not sure if your data are lawfully processed, you may ask the Data Controller to restrict the data processing. You may also object, on compelling legitimate grounds, to the processing of data relating to you. Additionally, you have the right to data portability which allows you to obtain the data that the Data Controller holds on you and to transfer it from one Data Controller to another. Where relevant and technically feasible, the EUAA will do this work for you.

Should you have any queries/questions concerning the processing of your personal data or should you wish to exercise your rights, please contact the Data Controller, i.e., the Head of the Monitoring Unit, by sending an e-mail to [monitoring@euaa.europa.eu](mailto:monitoring@euaa.europa.eu).

You may always submit queries, remarks or complaints relating to the processing of your personal data to the Data Protection Officer (DPO) of the EUAA using the following e-mail address: [dpo@euaa.europa.eu](mailto:dpo@euaa.europa.eu).

In case of conflict, complaints can be addressed to the European Data Protection Supervisor (EDPS) using the following e-mail address: [supervision@edps.europa.eu](mailto:supervision@edps.europa.eu).

*Endorsed: 30 July 2025*