

EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

1	Title of the processing activity	COARM Online System exchange platform in the field of arms export control
2	Update of the record (last modification date)	04/01/2024
3	Register reference number	2661
4	Identity and contact details of the Data Controller Joint Controller (if applicable) Data Processor (if applicable)	European External Action Service Rond Point Schuman 9A, 1046 Brussels, Belgium Security and Defence Policy Directorate Disarmament, Non-Proliferation and Arms Export Control Division - MD-PSD.SECDEFPOL.4 COARM-DB@eeas.europa.eu
5	Identity and contact details of the Data Protection Officer	EEAS Data Protection Officer (DPO): Emese Savoia-Keleti. SG.AFFGEN.DPO Functional Mailbox of the DPO: DATA-PROTECTION@eeas.europa.eu
6	Purpose of the processing activity	<p>The COARM Online System is an information exchange platform that connects the arms export control authorities of all EU Member States and Norway.</p> <p>The platform is used to exchange information in the field of arms export:</p> <ul style="list-style-type: none"> - submission of data on granted export licences and actual exports; - notifications of denied and suspended licences, and consultations on these notifications; - notifications of 'additional information', an open category that allows exchange of any information of interest for export control purposes; - tour-de-table exchanges on specific destination countries or on specific topics. <p>The information is provided by public authority officials of EU Member States and Norway.</p> <p>It is important to note that personal data of the users are processed by the EEAS as joint controller for the sole purpose of definition of roles, authentication / authorisation and log keeping.</p> <p>The purpose of the COARM Online System is to exchange information on numbers and values of export licences and arms exports, narrative lines of reasons for denials and suspensions, consultations on export control decisions; i.e. information that pertains to non-personal data. Data is submitted by the EU Member States and Norway; the EEAS offers the platform to exchange this information.</p> <p>In case personal data of an arms exporter or importer being a natural person (also if the name of a company is the name of an individual or if a contact person is given) or a person participating in the export authorisation process is included, the purpose of processing is the exchange of information described above.</p> <p>An online database for arms export licensing officers is embedded in the COARM Online System. The database is a platform for licensing officers to consult relevant information when assessing arms export license applications. Country pages are available for all non-EU independent states based on UN Membership, with the exception of some micro-States. A country page includes internet links to / information from a variety of sources, including from the EU itself, international organisations, civil society and academia. The database is only accessible to Member States' and Norwegian officials that have access to the COARM Online System, and to relevant EEAS experts (COARM Chair and Alternate Chair, Secretariat supporting the (Alternate) Chair, and a number of EEAS experts working in geographical divisions). The EEAS experts working in geographical divisions do not have access to the other sections of the COARM Online System.</p>

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7	Legal basis and lawfulness	<p>Lawfulness: The processing of your personal data is necessary for the performance of a task carried out by the European External Action Service in the public interest, in particular for the management and functioning of the EEAS [Article 5(1)(a) of Regulation (EU) 2018/1725 as referred to in Recital 22 thereof].</p> <p>Legal references:</p> <p>Council Common Position 2008/944/CFSP of 8 December 2009 defining common rules governing control of exports of military technology and equipment</p> <p>Council Decision (CFSP) 2019/1560 of 16 September 2019 amending Common Position 2008/944/CFSP defining common rules governing control of exports of military technology and equipment</p> <p>Further legal reference: Council Decision of 26 July 2010 establishing the organisation and functioning of the EEAS (2010/427/EU) – OJ L 201, 3/8/2010, p. 30.</p>
8	Categories of individuals whose data is processed - Data subjects	<p>Personal data for authentication / authorisation and log keeping, from:</p> <ul style="list-style-type: none"> - Designated EU Member States' and Norwegian individuals working for public authorities (Arms export licensing officers, National Administrators and other users of the system); - EEAS COARM team / system administrators and a limited number of EEAS geographical colleagues. - Arms exporters and importers if they are natural persons, if the name of a company is the name of an individual or when contact persons are given and persons participating in the export authorisation process – if their data are registered in COARM.
9	Categories of data - Data processed	<p>Personal data of the users:</p> <ul style="list-style-type: none"> - Country - Last Name - First Name - Email address - Institution/Ministry/Agency/Organisation - Country entity / region (if applicable) - EU Login username <p>Personal data of arms exporters and importers if they are natural persons, if the name of a company is the name of an individual or when contact persons are given and persons participating in the export authorisation process:</p> <ul style="list-style-type: none"> - Name - Organisation - Contact data including country and/or nationality
10	Recipients of data – Access to data	<p>Within the EEAS: (Alternate) Chair of COARM Working Group, Secretariat supporting the aforementioned (Alternate) Chair, and a limited number of EEAS geographical colleagues (only for the Licencing Officers database).</p> <p>Outside the EEAS: EU Member States' and Norwegian arms export control authorities' users. Data is only visible to users that have been granted the role(s) to see the information shown in that specific section of the COARM Online System.</p>
11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	N/A

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12	Time limit for keeping the data - Retention period	User accounts can be de-activated by the persons who created them (see point 4); they are deactivated when a user leaves the organisation or changes functions so that is no longer entitled to capture data in the COARM system. Entries will be anonymous after the user who inserted them ceases to be a user.
13	Data Storage	For archiving purposes, data of users is be kept in a separate database (to keep a record of who was responsible for which country/ domain).
14	General description of security measures	<p>An authentication/authorisation system is used to prevent any unauthorised disclosure or access to the application.</p> <p>Accidental loss of data is prevented by the DIGIT infrastructure architecture and back-up procedures.</p> <p>Authorised users of the system can access no other data other than that to which their access right refers ('user roles').</p> <p>Unauthorised reading, copying, alteration or removal of storage media is prevented by the fact that the application is hosted in a DIGIT data centre, with a DIGIT infrastructure architecture and back-up procedures.</p> <p>The application has logging procedures implemented, allowing the tracking of user actions.</p>
15	Rights of individuals	<p>Data subjects have the right to access their personal data and the right to correct any inaccurate or incomplete personal data. They also have the right to have their user account disabled.</p> <p>If the data subject has any queries concerning the processing of his/her personal data, she/he may address them to the data controller according to point 4. Queries and requests to the EEAS have to be addressed to the following functional mailbox: COARM-DB@eeas.europa.eu .</p>
16	Information to data subjects	Data subject are informed by means of a Privacy Statement related to this processing activity.