



# OCCAR Privacy Statement

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## 1. Introduction

OCCAR (Organisation Conjointe de Coopération en matière d'Armement / Organisation for Joint Armament Co-operation) is an international organisation whose core business is the through-life management of cooperative defence procurement programmes.

The organisation has its own legal status, established by means of the OCCAR Convention (equivalent to an international treaty), and operates under procedures governed by its member states. It is OCCAR policy to respect the spirit of EU Regulations and Directives, which are not binding upon it.

With this privacy statement, OCCAR intends to inform you, in a transparent manner, about the personal data OCCAR collects, the purpose for collecting it, the way OCCAR uses it and the rights you have regarding the processing of such data.

## 2. Why does OCCAR collect and process your personal data?

OCCAR may collect and process information about you through your use of its services in order to fulfil its obligations in delivering that service to you, or as part of its daily business in accordance with the OCCAR Convention.

All personal data collected and managed by OCCAR is processed in accordance with this privacy notice, the use for which is founded upon the following legal bases:

- The necessity for OCCAR to deliver a service to individuals (users, staff, etc);
- The necessity for OCCAR to comply with legal obligations, and to establish, exercise, or defend against legal claims;
- The necessity for OCCAR to pursue legitimate interests, such as:
  - To ensure that OCCAR networks and information are secure;
  - To administer and maintain services provided or managed by OCCAR;
  - To prevent or investigate suspected or actual violations of law and breaches of acceptable use or other applicable policies.

The type of personal data OCCAR collects about you depends upon which OCCAR services you make use of and how you interact with OCCAR as an organisation. However, in all cases OCCAR is committed to protecting your privacy and the personal data you provide.

### **3. Services provided by OCCAR that may require collection of Personal Data**

#### **3.1 The OCCAR Website**

OCCAR operates a publically accessible website that provides information to external parties about OCCAR's various programmes and their associated activities.

In order to deliver the most effective visual and functional web experience for the type of device visitors use to access the service, and to protect the integrity of information presented through this service, it is necessary for the service to collect some personal data, as outlined below.

##### **3.1.1 What personal data does OCCAR collect and process?**

Use of the OCCAR website may require collection of the following information:

- The type of device, the name and version of its operating system, and name and version of the Browser software you use to access the website;
- Your IP address, and the Geographic region it belongs to;
- The URL of the webpage that referred you to the OCCAR website;
- Any pages you visit within the OCCAR website.

##### **3.1.2 How long does OCCAR keep your data, and who has access to it?**

The OCCAR Website is hosted on OCCAR's behalf by a third party hosting provider, who use web traffic analysis services offered by a variety of EU-based vendors in order to collect the above information, and provide summary reports about how the website is used (most frequent pages visited, by which geographic region, page referrer, device/OS/browser type etc).

The OCCAR website does not make use of advertising or other marketing-related tracking activities. As such, the information collected on OCCAR's behalf is not sold or otherwise shared with third parties.

#### **3.2 OCCAR's digital collaboration Services**

OCCAR provides a number of digital collaboration services for use by external partners in support of OCCAR programmes, including (but not limited to):

- OCCAR's Extranet: a file-sharing service that facilitates exchange of information between known users;
- OCCAR's WebEx and VTC solutions: web, video, and voice conferencing solutions that allow real-time voice, video and digital collaboration between invited participants.

##### **3.2.1 What personal data does OCCAR collect and process?**

Use of OCCAR's digital collaboration services may require collection of the following information:

- The E-mail address, username, and authentication information used to access the service;
- The type of device, the name and version of its operating system, and name and version of the client software used to access the website;
- The name, time and duration of any meetings you are invited to or attend, and a list of associated hosts and participants;
- The time and duration of your connection to the service and metadata relating to the information, files or other content you upload to the service or send to others while using the service (date/time of creation, access permissions for the file, file name, size, uploader etc);
- Data/files/content you voluntarily upload or otherwise provide to the service for the express intent of being accessible by the audience, or by other users of the system for an extended period, or in response to questions asked of you (in the case of questionnaires, tests, or polls);
- When specifically enabled by authorised hosts, the broadcasted content of a meeting may be recorded (including voice and video shared by participants) in order to facilitate retrospective playback of a session for the benefit of individuals who could not attend the live event. Where this is the case, it is the responsibility of the host to indicate to participants that the session is being recorded.

### 3.2.2 How long does OCCAR keep your data, and who has access to it?

Meeting invitations, records of participation, and file uploads are kept until they are removed or deleted by an authorized user (i.e. the original uploader or host of a meeting). This information is usually distributed to or otherwise available to all participants of a meeting, or all users with read rights to the location the information was stored (as defined by the originator).

Responses to questionnaires, online tests, and other polls are usually anonymised, and only made available to authorised individuals, usually the creator of the request and/or system administrators. They are kept at the discretion of the request creator.

Recorded sessions are made available only to the host, after the session has ended. It is the responsibility of the host to inform participants of any further distribution or use of recorded sessions.

Logging data relating to system use may be retained by OCCAR for up to two years in accordance with OCCAR security regulations. Only OCCAR system administrators and authorised security auditors have access to this information.

### 3.3 Access to OCCAR's Premises

If you need to visit OCCAR at one of its premises, it may be necessary to collect personal data about you, both in advance of, and during a visit. In addition, in order

to provide some convenience services to you while on site, additional information may be collected about your mobile devices, as outlined below.

### 3.3.1 What personal data does OCCAR collect and process?

When visiting an OCCAR site, you may be required to submit a Request for Visit (RfV) prior to arrival in order to verify the existence and conditions of any associated security clearances you may have, in particular when the purpose is to discuss classified information.

Upon arrival, all visitors must provide proof of identification, which will be retained for the duration of your visit. The identification document number, your name, and date of visit will also be recorded in a visitor logbook.

When visiting a site that has a Guest WiFi service, the following additional information may be collected:

- When actively connected to the service:
  - The hardware model, device name, IMEI number, MAC address, IP address, operating system type and version, and settings of the device relevant for establishing a successful connection to the service;
  - The access points used by your device(s) to access the service;
  - The time and duration of your use of the service;
  - The categories of websites or services you access through the service.
- When using a personal WiFi hotspot within the range of the service:
  - The SSID and MAC address of your hotspot.

### 3.3.2 How long does OCCAR keep your data, and who has access to it?

Depending on the OCCAR site you visit, it may be necessary for visitor information (such as RfVs and logbooks) to be collected and/or processed by authorized third parties (such as Facility Management companies, or site owners) in order to gain lawful entry to the site upon which OCCAR's premises are located. This may require you to provide the information directly to them, or for OCCAR to provide it to them on your behalf. This information is managed in accordance with their company-specific privacy statements.

RfVs and visitor logbook data processed by OCCAR are kept for 2 years in accordance with OCCAR security regulations, and are only accessible to OCCAR Security personnel.

The Guest WiFi service is owned and operated by OCCAR through use of an EU-based cloud services provider. The information collected is only made available to OCCAR-authorized users, and is kept no longer than 90 days, however summary reports containing general, anonymised statistics of

system use may be retained by OCCAR for up to two years. Within OCCAR, this information is only available to OCCAR System Administrators.

### 3.4 Recruitment for OCCAR Vacancies

When applying for an OCCAR vacancy, it is necessary for OCCAR to collect and process personal data about you in order to assess and evaluate your suitability for the vacancy, and (if successful) to coordinate with relevant service providers in preparation for your appointment within the organization.

#### 3.4.1 What personal data does OCCAR collect and process?

The OCCAR application process may require collection of the following information about applicants:

- Details regarding work and education history;
- Details regarding competency, skills, and experience relevant to the vacancy being applied for;
- Details of any language proficiency;
- Details relating to their eligibility to work for OCCAR;
- Proof of their highest level of education;
- Proof of their identification;
- Details of any spouses or dependents;
- Any further information the applicant feels pertinent to the application and provides voluntarily in a covering note.

#### 3.4.2 How long does OCCAR keep your data?

The information submitted to OCCAR by applicants is kept for the duration of the recruitment process.

Upon appointment of an individual to the position, individual applications and associated evidence of unsuccessful candidates are destroyed or deleted, while for successful candidates these are retained in order to deliver the services necessary for employment.

Individual assessments generated during the recruitment process are destroyed, however a report summarizing the outcome of the recruitment campaign (including candidate names and nationalities, the post number applied for, and relevant dates) will be retained for 10 years in accordance with OCCAR procedures.

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

The information submitted to OCCAR is only made available to OCCAR's Human Resources Division and, where necessary, to delegated OCCAR HR representatives, and Sift/Interview panel members, in accordance with OMP9.

The information is not disclosed outside OCCAR.

### 3.5 Employment and Contracting

As an employer, OCCAR is required to provide a variety of services to its personnel in accordance with the requirements established through the OCCAR Convention and relevant OMPs. Furthermore, in order to facilitate the provision of services to its personnel, Member States and Programme Participating States, it may be necessary for OCCAR to contract additional personnel from third parties, to whom OCCAR is also obliged to provide certain services as a contracting authority.

The delivery of these services may require OCCAR to collect, process and in some cases transfer personal data about employees, engaged Detached National Experts or prospective contracted personnel (herein cumulatively referred to as "workers") to third party organizations, as outlined below.

#### 3.5.1 What personal data does OCCAR collect and process?

In order to deliver necessary services to OCCAR workers, it may be necessary to collect, process, and retain the following information:

- About the worker:
  - Information relating to their application for the work vacancy;
  - The results of a mandatory medical exam (not including medically sensitive information), demonstrating fitness for their appointment to the work vacancy;
  - Volunteered results of optional yearly medical examinations;
  - Details of bank accounts and applicable emoluments;
  - Reports and assessments relating to the worker's ability to deliver against set goals and objectives;
  - Volunteered information relating to the worker's vehicle(s), associated insurances, and travel discount entitlements;
  - Their address, phone number, and emergency contact information;
- About the worker and/or their dependents:
  - Volunteered details of medical conditions;
  - Proof of employment, education status, marital status, and additional family income;
  - Other information (medical or financial) voluntarily disclosed to OCCAR by the worker in order to obtain support from OCCAR in resolving issues with the insurance provider, demonstrate entitlement to available emoluments, or apply for/provide justification for various forms of absence;

### 3.5.2 How long does OCCAR keep your data and who has access to it?

OCCAR keeps information collected about individual workers for the duration of their respective contracts. At the earliest opportunity following the departure of an individual, non-pertinent information is destroyed. A basic record of the individuals' employment, current contact information, and any other pertinent information will be kept by OCCAR Human Resources for no more than 10 years, in accordance with OCCAR policy.

Pertinent information is context-dependent and may include (but not be limited to):

- Reports or assessments that may be requested by individuals or their nations as evidence of their activities within OCCAR;
- Information relating to long-term medical conditions that require ongoing engagement with the individual and relevant service providers;
- Information relating to the provident fund, and the individuals' entitlements to capital within the fund upon their departure.

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

Within OCCAR-EA this information is only made available to OCCAR's Human Resources Division and, where necessary, to delegated OCCAR HR representatives in accordance with OMP8.

In order for OCCAR to deliver necessary employment services (health insurance, provident fund etc), it may be necessary for OCCAR to share some of this information with third party service providers in order to on-board workers to these services, in accordance with their respective privacy policies.

### 3.6 Other ways OCCAR may need to collect and use your personal data

In addition to the advertised services above, it may be necessary for OCCAR to collect and use your personal data in order to provide ad-hoc services, for example:

- To handle any E-mails you send us, in order to ensure they are delivered to the most appropriate destination to service your queries or requests;
- To contact you, e.g. in response to a query or suggestion, or to mail documents, publications etc. to you;
- For OCCAR's business relationship with OCCAR Member States, Programme Participating States and Contractors.

OCCAR only keeps the data for as long as follow-up actions on the contribution are necessary with regard to the purpose(s) of the processing of personal data.

## **4. How does OCCAR protect your data?**

### **4.1 Technical protections**

OCCAR collects and stores personal data within a secured site and/or secured ICT network.

The implementation and ongoing operation of all technical solutions are subject to oversight, inspection and audit in accordance with OCCAR's internal Security management procedures, ensuring that deviations from these standards are appropriately controlled and mitigated.

### **4.2 Legal Protections**

OCCAR will only transfer personal data to another international organisation or a Non-Member State not participating in an OCCAR Programme if OCCAR has determined that adequate safeguards are in place to protect such personal data.

The same condition applies to EU-based commercial entities.

## **5. What are your rights in relation to your personal data?**

Due to the sensitivity of OCCAR's business, some details relating to specific partnerships with vendor services and partners have not been fully disclosed in this privacy statement. Should you require more detailed information regarding OCCAR's technical partnerships with regard the collection, handling and processing of your personal data you may contact OCCAR: [info@occar.int](mailto:info@occar.int)

Similarly, you can, at any time, request access to your personal data, rectify them, request restriction of processing them on compelling grounds, transfer them, and request them to be erased if they have been unlawfully processed, also by writing to OCCAR: [info@occar.int](mailto:info@occar.int)

## **6. Additional Concerns**

### **6.1 Disclaimer**

Some OCCAR services contain, or otherwise make use of links to services outside OCCAR's control. OCCAR assumes no responsibility for such services and makes no claims or aspersions regarding their privacy practices or content.

### **6.2 Notification of changes**

This privacy notice is subject to change at any time, and shall take effect upon publication to OCCAR's website.

### **6.3 Contact OCCAR**

If you have any questions, concerns or complaints about the way that your personal data has been or is being processed, please direct it to OCCAR: [info@occar.int](mailto:info@occar.int)