

# Privacy Notice – Security Clearance for Candidates and Examiners to Access Military Medical Academy in Cairo, Egypt.

## 1 Data Controller

The data controller is:

**European Society of Anaesthesiology and Intensive Care (ESAIC AISBL)**

Rue des Comédiens 24

1000 Brussels

Belgium

Email: [info@esaic.org](mailto:info@esaic.org)

Data Protection Officer: [privacy@esaic.org](mailto:privacy@esaic.org)

## 2 Purpose of the Processing

Identification personal data are processed solely for the purpose of obtaining mandatory security clearance required to access the premises of the Military Medical Academy (MMA) in Cairo, where the examination will take place.

Access to the examination venue is subject to strict security requirements imposed by the host military institution. Without successful security clearance, entry to the premises and participation in the exam is not possible.

The data will not be used for any other purpose.

## 3 Legal Basis for Processing

### 3.1 Collection and use of identification data

The processing of your personal data is based on:

- Article 6(1)(b) GDPR – the processing is necessary for the performance of the contractual arrangements related to the organization of the examination and your participation therein.

In addition, the processing reflects mandatory security requirements imposed by the host institution and applicable local regulations as a condition for access to the examination premises.

### 3.2 International data transfer

As the examination takes place in Egypt, personal data might be transferred from Belgium to the Military Medical Academy in Cairo (e.g. list of candidates).

Egypt does not benefit from an adequacy decision under Article 45 GDPR. The transfer is therefore based on the derogation mechanism under:

- Article 49(1)(b) GDPR – the transfer is necessary for the performance of the examination taking place in Egypt and cannot be reasonably carried out without such transfer.

The derogation is applied restrictively and only in relation to this specific examination event. Indeed, this transfer is limited to the organization of this examination event and does not involve ongoing or repeated transfers of the same personal data.

## 4. Categories of Personal Data Processed

For security clearance purposes, ESAIC processes the following personal data of candidates to be able to participate to the examination :

- Identification data, including:
  - full legal name
  - nationality
  - date of birth
  - passport number
- A full copy of the passport including the photograph, as explicitly required by the Military Medical Academy for identification and security clearance

Only data strictly required for security clearance is collected and processed.

## 5. Source of the Data

The personal data is collected directly from you during the exam registration process.

## 6. Recipients of the Data

Your personal data will be collected/processed exclusively by:

- The Military Medical Academy in Cairo, acting as ESAIC's local partner for exam organization and necessary for security clearance

The data will not be transferred to other recipients and will not be transferred outside Egypt.

## 7. International Data Transfer

Your personal data will be transferred to Egypt, a third country without an EU adequacy decision under what is called derogation under GDPR, meaning that this transfer remains occasional and necessary for participating to the examination.

The transfer:

- is strictly necessary for access to the examination premises;
- is limited in scope and duration;
- is carried out exclusively for security clearance purposes.

## 8. Retention Period

ESAIC will retain your identification data only for the time necessary to obtain security clearance and conduct the examination.

The data will be deleted immediately after the examination has taken place, unless retention is required by mandatory legal obligations imposed on the Military Medical Academy.

ESAIC has instructed its local partner accordingly.

## 9. Data Security

ESAIC implements appropriate technical and organizational measures to protect your personal data, including:

- restricted access to authorized personnel only;
- secure transmission of data;
- deletion procedures following the examination.

## 10. Your Rights

You have the right to:

- request information about or access your personal data;
- request rectification of inaccurate data;
- request restriction of processing, where applicable;
- object to processing, where applicable;
- to request por
- Request erasure of the data (this will result in having no access to the premises / the personal data will be deleted right after the examination has taken place)

Requests may be addressed to the DPO at: [privacy@esaic.org](mailto:privacy@esaic.org)

## 11. Right to Lodge a Complaint

You have the right to lodge a complaint with a supervisory authority.

In Belgium, the competent authority is:

Autorité de protection des données / Gegevensbeschermingsautoriteit  
Rue de la Presse / Drukpersstraat 35  
1000 Brussels  
Belgium  
[www.dataprotectionauthority.be](http://www.dataprotectionauthority.be)