

I. RECORD OF PERSONAL DATA PROCESSING OPERATION (Article 31 of Regulation (EU) No. 2018/1725)

1.	Name of the processing operation	Learning & Development
2.	Reference number/Issue	ETF-DPR-01/Issue 2
3.	Date	21/10/2019
4.	Business owner	Nadège Perrine Head of HR Unit Nadège.Perrine@etf.europa.eu
5.	Controller	Cesare Onestini Director of the ETF mailto:Cesare.Onestini@etf.europa.eu
6.	Joint controller(s)	Not applicable
7.	Processor(s)	External contractors process data of participants to specific types of training (e.g. firefighting, first aid)
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu

9.	Purpose of the processing	Managing staff applications to learning and development activities approved by the Reporting Officer(s)
10.	Legal basis for the processing	Staff Regulations art. 24a on EU facilitating access to training for staff members to proper functioning of the service Decision of the ETF Governing Board on the Framework for Learning and Development at the ETF, ref. GB/18/DEC/005
11.	Categories of data subjects	ETF staff, SNEs, trainees and temporary workers
12.	Categories of personal data	Name, e-mail For specific training courses, additional information might be needed (e.g. date and place of birth, fiscal code, private address)
13.	Time limits for keeping of data	Until termination of service (with the exception of data transferred to external contractors which are kept for three years)

14.	Categories of ETF recipients of data	L&D Officer(s), Managers, Director
15.	Categories of external recipients of data	External contractors organising/providing training In the case of firefighting/first aid trainings, data are provided to local authorities for the inscription of data subjects to the relevant registers
16.	Transfers of data to third country or international organisation	Not applicable

17.	Technical and organisational security measures	Data are stored in the electronic HR management system and in the financial management systems. Access is limited to authorized actors via user authentication (ID and password)
18.	Information to the data subject	Provided in privacy statement

II. COMPLIANCE CHECK AND RISK SCREENING OF PERSONAL DATA PROCESSING OPERATION (Article 26 and 39 of Regulation (EU) No. 2018/1725)

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A. Compliance check

19.	<p>Lawfulness (Legal basis and necessity for processing, point 10)</p> <p><input type="checkbox"/> Necessary for performance of tasks in the public interest attributed by EU or MS legislation</p> <p><input checked="" type="checkbox"/> Necessary for the management and functioning of the organisation</p> <p><input type="checkbox"/> Necessary for compliance with legal obligation incumbent on controller</p> <p><input type="checkbox"/> Necessary for performance of a contract to which the data subject is party</p> <p><input type="checkbox"/> The data subject has given consent</p> <p><input type="checkbox"/> Necessary in order to protect the vital interests of the data subject or of another natural person</p>	
20.	<p>Purpose definition (Point 9)</p> <ul style="list-style-type: none"> Do you list all purposes? Are the purposes specified, explicit, legitimate? Where information is also processed for other purposes, are you sure that these are not incompatible with the initial purpose(s)? 	<ul style="list-style-type: none"> Yes Yes Not applicable
21.	<p>Data minimisation (Point 12)</p> <ul style="list-style-type: none"> Do you really need all data items you plan to collect? Are there any you could do without? 	<ul style="list-style-type: none"> Yes No
22.	<p>Accuracy (Point 12)</p> <ul style="list-style-type: none"> How do you ensure that the information you process about people is accurate? How do you rectify inaccurate information? 	<ul style="list-style-type: none"> Data provision is under the responsibility of the data subject As the presence of an inaccurate information is signalled, a check is put in place and as applicable relevant rectification is made
23.	<p>Storage limitation (Point 13)</p> <ul style="list-style-type: none"> Explain why you chose the storage period(s) mentioned Are they limited according to the maximum or minimum "as long as necessary, as short as possible"? In case you only need some information for longer, can you split storage periods? 	<ul style="list-style-type: none"> The retention period for trainings falling under the Italian legislation (DL 9/04/2008 n. 81) is 3 years after the end of the training course As short as possible Not applicable

COMPLIANCE CHECK AND RISK SCREENING - Learning & Development

24.	Transparency (Point 18) <ul style="list-style-type: none"> How do you tell people about your processing? If you do not want to inform people (or only inform them after the fact), consult your DPO 	<ul style="list-style-type: none"> The privacy statement is made available in the L&D section of the HR management system Not applicable
25.	Data subjects rights (Point 18) <ul style="list-style-type: none"> Can people contact you if they want to know what you have about them, want to correct or delete the data, have it blocked or oppose to the processing? Could there be situations where you would want to refuse e.g. granting access? In case so please describe them 	<ul style="list-style-type: none"> Yes Not applicable

B. Risk screening

26.	Does the processing involve any of the following?				
	<ul style="list-style-type: none"> Data relating to health, (suspected) criminal offences or otherwise considered sensitive 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> Evaluation, automated decision- making or profiling 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> Monitoring data subjects 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> New technologies that may be considered intrusive 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> Exclusion databases 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> Large-scale processing of special categories of personal data (disease surveillance, pharmacovigilance, central databases for law-enforcement cooperation) 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> Internet traffic analysis breaking encryption 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> E-recruitment tools automatically pre-selecting/excluding candidates without human intervention 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> Management of personal files 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> Staff evaluation procedures (annual appraisal) 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> 360° evaluations for helping staff members develop training plans 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> Staff selection procedures 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> Establishment of rights upon entry into service 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> Management of leave, flexitime and telework 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> Access control systems (non biometric) 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<ul style="list-style-type: none"> Video surveillance (limited scale) 	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No

C. Conclusions

	Actor	Date	Signature
27.	Business owner Nadège Perrine Head of HR Unit Conclusion No further action required		
	Data Protection Officer: Tiziana Ciccarone / Laurens Rijken Conclusion I confirm that no further action is required		
	Data Controller Cesare Onestini, Director of the ETF		