

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

1.	Name of the processing operation	<b>Open Space</b>
2.	Reference number/Issue	ETF-DPR-02/Issue 2
3.	Date	20/09/2019
4.	Business owner	Alastair Macphail Head of Communication Department Alastair.macphail@etf.europa.eu
5.	Controller	Cesare Onestini Director of ETF <a href="mailto:Cesare.onestini@etf.europa.eu">Cesare.onestini@etf.europa.eu</a>
6.	Joint controller(s)	Not applicable
7.	Processor(s)	Outsourced contractors for administration and hosting of the website
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken <a href="mailto:DataProtectionOfficer@etf.europa.eu">DataProtectionOfficer@etf.europa.eu</a>

9.	Purpose of the processing	The purpose of collecting personal data of Open Space members is to exchange information and facilitate interaction between the users and ETF and networking among the site members
10.	Legal basis for the processing	Regulation No. 1339/2008 establishing the European Training Foundation (Recast), Article 2
11.	Categories of data subjects	Open Space registered members (both externals and ETF staff)
12.	Categories of personal data	Name and email address (mandatory to register) Optional: profile image, job title, organisation, phone number, locations, links to social profiles (Facebook, Twitter, LinkedIn, personal website), bio – these data are not mandatory and may be filled by the users who want to make them public in the site.
13.	Time limits for keeping of data	Data are kept for two years from the last registered access

14.	Categories of ETF recipients of data	Open Space site manager, content and group managers
15.	Categories of external recipients of data	Contractor for administration and hosting of the site Members of the Communities (only user name – all other data upon choice of the user)
16.	Transfers of data to third country or international organisation	Not applicable

17.	Technical and organisational security measures	Access to Open Space registered user profile and any right of modification of its data is limited to members only via user authentication (ID and password). Access to the Open Space management systems used is limited to authorised actors via user authentication (ID and password), both for ETF and external contractors
18.	Information to the data subject	Provided in the 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><b>Lawfulness</b> (Legal basis and necessity for processing, point 10)</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Necessary for performance of tasks in the public interest attributed by EU or MS legislation</li> <li><input type="checkbox"/> Necessary for the management and functioning of the organisation</li> <li><input type="checkbox"/> Necessary for compliance with legal obligation incumbent on controller</li> <li><input type="checkbox"/> Necessary for performance of a contract to which the data subject is party</li> <li><input type="checkbox"/> The data subject has given consent</li> <li><input type="checkbox"/> Necessary in order to protect the vital interests of the data subject or of another natural person</li> </ul>	No consent is requested from data subjects
20.	<p><b>Purpose definition</b> (Point 9)</p> <ul style="list-style-type: none"> <li>• Do you list all purposes?</li> <li>• Are the purposes specified, explicit, legitimate?</li> <li>• Where information is also processed for other purposes, are you sure that these are not incompatible with the initial purpose(s)?</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> <li>• Yes</li> <li>• Not applicable</li> </ul>
21.	<p><b>Data minimisation</b> (Point 12)</p> <ul style="list-style-type: none"> <li>• Do you really need all data items you plan to collect?</li> <li>• Are there any you could do without?</li> </ul>	<ul style="list-style-type: none"> <li>• Yes (mandatory data)</li> <li>• The optional data, provided on voluntary basis by the user</li> </ul>
22.	<p><b>Accuracy</b> (Point 12)</p> <ul style="list-style-type: none"> <li>• How do you ensure that the information you process about people is accurate?</li> <li>• How do you rectify inaccurate information?</li> </ul>	<ul style="list-style-type: none"> <li>• Data is validated by the Group Manager(s) and as applicable rectified by the Site Manager</li> <li>• As the presence of an inaccurate information is signalled, a check is put in place and as applicable relevant rectification is made</li> </ul>
23.	<p><b>Storage limitation</b> (Point 13)</p> <ul style="list-style-type: none"> <li>• Explain why you chose the storage period(s) mentioned</li> <li>• Are they limited according to the maximum or minimum “as long as necessary, as short as possible”?</li> <li>• In case you only need some information for longer, can you split storage periods?</li> </ul>	<ul style="list-style-type: none"> <li>• The storage period of two years is chosen as a reasonable indicator of lack of interest of the data subject</li> <li>• As short as possible</li> <li>• Not applicable</li> </ul>
24.	<p><b>Transparency</b> (Point 18)</p> <ul style="list-style-type: none"> <li>• How do you tell people about your processing?</li> <li>• If you do not want to inform people (or only inform them after the fact), consult your DPO</li> </ul>	<ul style="list-style-type: none"> <li>• With privacy statement published on the site</li> <li>• Not applicable.</li> </ul>

## COMPLIANCE CHECK AND RISK SCREENING - Open Space

25.	<b>Data subjects rights</b> (Point 18) <ul style="list-style-type: none"> <li>• 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?</li> <li>• Could there be situations where you would want to refuse e.g. granting access? In case so please describe them</li> </ul>	<ul style="list-style-type: none"> <li>• Yes.</li> <li>• Not applicable</li> </ul>
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### B. Risk screening

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

### C. Conclusions

	Actor	Date	Signature
27.	<b>Business owner</b> Alastair Macphail Head of Communication Department  <b>Conclusion</b> No further action required		
	<b>Data Protection Officer:</b> Tiziana Ciccarone / Laurens Rijken  <b>Conclusion</b> I confirm that no further action is required		
	<b>Data Controller</b> Cesare Onestini, Director of the ETF		