

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

1.	Name of the processing operation	<b>Events Organisation</b>
2.	Reference number/Issue	ETF-DPR-03/Issue 1
3.	Date	18/12/2018
4.	Business owner	Alastair MacPhail Head of Communication Department Alastair.macphail@etf.europa.eu  Anastasia Fetsi Head of Operations Department <a href="mailto:Anastasia.fetsi@etf.europa.eu">Anastasia.fetsi@etf.europa.eu</a>
5.	Controller	Cesare Onestini Director of ETF Cesare.onestini@etf.europa.eu
6.	Joint controller(s)	Not applicable
7.	Processor(s)	Conference Organisers; ETF makes use of an EU based professional conference organiser for corporate events, and has additional contracts with companies in the partner countries which, among the services they provide to the ETF, organise conferences
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken Email: DataProtectionOfficer@etf.europa.eu

9.	Purpose of the processing	For the organisation and management of the event personal data are collected during the registration and further processed. Personal data may also be collected and processed for the following other purposes: <ul style="list-style-type: none"> <li>• For sharing with other participants: personal contact details are requested and published on the List of Participants distributed at the event.</li> <li>• For registration in the ETF stakeholders` database for future contact purposes related to ETF`s activities</li> <li>• For communication purposes: photographs and video footage taken for and/or during the event</li> </ul>
10.	Legal basis for the processing	RECAST regulation (EC) No 1339/2008 article 2 Functions
11.	Categories of data subjects	Event participants
12.	Categories of personal data	Name, telephone, fax, e-mail, address, nationality, gender, organisation details, and for some specific cases ID/ passport details, credit card details
13.	Time limits for keeping of data	Data are kept for a maximum of 7 years.

14.	Categories of ETF recipients of data	ETF Staff
15.	Categories of external	Conference Organisers may transfer data to suppliers/contractors for

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	recipients of data	travel, accommodation, catering and other services
16.	Transfers of data to third country or international organisation	Local Conference Organisers in third countries
17.	Technical and organisational security measures	Access to the ETF and the Corporate conference organiser's systems are managed through individual usernames and passwords, with levels of access granted through dedicated roles assigned to the individual and/or groups of users. Security of the systems is further assured through the standard ETF / conference organiser security measures for their data servers.
18.	Information to the data subject	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> <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 checked="" 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>	<p>No consent is asked for the processing of personal data for the organisation and management of the event. However, for</p> <ul style="list-style-type: none"> <li>• sharing with other participants:</li> <li>• For registration in the ETF stakeholders' database</li> <li>• For communication purposes</li> </ul> <p>participants' specific consent is asked during registration and/or during the event</p>
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>• Yes</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</li> <li>• No</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 ETF and as applicable rectified</li> <li>• As the presence of an inaccurate information is signalled, a check is put in place and 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>• 7 years: 5 years (for audit purposes) after the discharge (2 years process) of the ETF budget by the Budgetary Authority</li> <li>• As short as possible</li> <li>• Not applicable</li> </ul>

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24.	<b>Transparency</b> (Point 18) <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>Privacy statement is provided as hyperlink in the registration form</li> <li>Not applicable</li> </ul>
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>

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>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</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>Access control systems</li> </ul>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> <li>Video surveillance</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  Anastasia Fetsi Head of Operations 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		

