

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

1.	Name of the processing operation	<b>Public access to documents</b>
2.	Reference number/Issue	ETF-DPR-04/Issue 1
3.	Date	18/12/2018
4.	Business owner	Samuel Cavanagh Public Access to Documents Officer, Directorate <a href="mailto:getdocuments@etf.europa.eu">getdocuments@etf.europa.eu</a>
5.	Controller	Cesare Onestini Director of the ETF <a href="mailto:cesare.onestini@etf.europa.eu">cesare.onestini@etf.europa.eu</a>
6.	Joint controller(s)	Not applicable
7.	Processor(s)	Not applicable
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken <a href="mailto&gt;DataProtectionOfficer@etf.europa.eu">DataProtectionOfficer@etf.europa.eu</a>

9.	Purpose of the processing	The purpose of collecting personal data is to manage the applications for public access to specific ETF documents.
10.	Legal basis for the processing	<ul style="list-style-type: none"> <li>Regulation (EC) No 1339/2008 of the European Parliament and of the Council of 16 December 2008 establishing a European Training Foundation (recast) art.4 paragraph 4.</li> <li>Regulation (EC) No 1049/2001 of the European Parliament and of the Council (30 May 2001): "Openness enables citizens to participate more closely in the decision-making process and guarantees that the administration enjoys greater legitimacy and is more effective and more accountable to the citizen in a democratic system"</li> <li>ETF Governing Board decision ref. GB/01/DEC/001 (30/04/2004): "Detailed rules for the application of regulations (EC) 1049/2001 and 1684/2003 regarding public access to European Training Foundation (ETF) documents"</li> </ul>
11.	Categories of data subjects	Requestors of documents
12.	Categories of personal data	Name, e-mail, address
13.	Time limits for keeping of data	Data are kept for two years from the closure of the application for access to documents. Aggregated data is kept for historical research purposes.
14.	Categories of ETF recipients of data	Public Access to Documents Officer, Legal Advisor (in the case of confirmatory applications)
15.	Categories of external recipients of data	Not applicable
16.	Transfers of data to third country or international organisation	Not applicable
17.	Technical and organisational security	Access to functional email account is limited the Public Access to Documents Officer via user authentication (ID and password)

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	measures	
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)

Name of the processing operation	<b>Public access to documents</b>
Reference number	ETF-DPR-04/Issue 1
Date	18/12/2018

### 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 checked="" 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>	
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</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 received from data subjects.</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 2 years storage period is related to the European Parliament discharge procedure</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>A privacy statement is available on the Public documents register section of the ETF website, and within the <a href="#">online request form</a>. In addition, the privacy statement is provided by the ETF Public Access to Document Officer when replying to individual requests.</li> <li>Not applicable.</li> </ul>
25.	<p><b>Data subjects rights</b> (Point 18)</p> <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.	<p><b>Does the processing involve any of the following?</b></p> <ul style="list-style-type: none"> <li>Data relating to health, (suspected) criminal offences or otherwise considered sensitive</li> <li>Evaluation, automated decision-making or profiling</li> <li>Monitoring data subjects</li> <li>New technologies that may be considered intrusive</li> <li>Exclusion databases</li> <li>Large-scale processing of special categories of personal data (disease surveillance, pharmacovigilance, central databases for law-enforcement cooperation)</li> <li>Internet traffic analysis breaking encryption</li> <li>Management of personal files</li> <li>Staff evaluation procedures</li> <li>Staff selection procedures</li> <li>Establishment of rights upon entry into service</li> <li>Access control systems</li> <li>Video surveillance</li> </ul>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

### C. Conclusions

	<b>Actor</b>	<b>Date</b>	<b>Signature</b>
27.	<p><b>Business owner</b> Samuel Cavanagh Public Access to Documents Officer, Directorate</p> <p><b>Conclusion</b> No further action required</p>		
	<p><b>Data Protection Officer:</b> Tiziana Ciccarone / Laurens Rijken</p> <p><b>Conclusion</b> I confirm that no further action is required</p>		
	<p><b>Data Controller</b> Cesare Onestini, Director of the ETF</p>		