

## I. RECORD OF PERSONAL DATA PROCESSING OPERATION (Article 31 of the new rules)

1.	Name of the processing operation	<b>Photos and video</b>
2.	Reference number/Issue	ETF-DPR-05/Issue 1
3.	Date	dd/mm/yyyy
4.	Business owner	Alastair Macphail Head of Communication Department Alastair.macphail@etf.europa.eu
5.	Controller	Cesare Onestini Director of ETF Cesare.onestini@etf.europa.eu
6.	Joint controller(s)	
7.	Processor(s)	Outsourced contractors working on photo and video production and editing Optional, outsourced contractors working on design, layout and printing of publications (see separate record on Publications)
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken Email: DataProtectionOfficer@etf.europa.eu
9.	Purpose of the processing	To document and illustrate ETF activities through the provision of suitable photo and video material for ETF intranet, website, social media channels and publications, including publication of content by or about ETF by third parties, with a view to engaging target audiences
10.	Legal basis for the processing	Regulation (EC) No 1339/2008 of the European Parliament and of the Council of 16 December 2008 establishing a European Training Foundation (recast), in particular Article 2, Functions
11.	Categories of data subjects	Stakeholders, beneficiaries and any other persons involved and participating in ETF events and project activities (e.g. speakers, event participants, VET teachers, students, employers, workers and so forth).
12.	Categories of personal data	Person's image (photo, video), name, location where image is shot
13.	Time limits for keeping of data	<ul style="list-style-type: none"> <li>• Default limit for all photo and video material: 5 years</li> <li>• After 5 years, a selection of the photo and video material is archived and kept for historical purposes without time limit</li> <li>• Photos and video that are published (paper, electronic media) also have no time limit (see Publications record)</li> </ul>
14.	Categories of ETF recipients of data	ETF editors/drafters, ETF communication officers
15.	Categories of external recipients of data	Readers of final ETF publications, browsers of ETF website and social media. Selected images may be used to illustrate ETF activities published in non-ETF publications
16.	Transfers of data to third country or international organisation	No

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17.	Technical and organisational security measures	Access to the systems used for storage and editing of photos and videos and in the publication process 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 privacy statement, or in occasional situations, orally.

## II. COMPLIANCE CHECK AND RISK SCREENING OF PERSONAL DATA PROCESSING OPERATION

Name of the processing operation	<b>Photos and video</b>
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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 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>	<ul style="list-style-type: none"> <li>Participants in ETF events provide consent in the event registration form;</li> <li>Subjects of photo or video shootage sign a written consent form. In case of video interviews, consent may also be recorded orally on video;</li> <li>In the case of subjects under 18, the purpose of the recording is explained, with due advance, to their teachers and/or supervisors who shall ensure passing this information to the parents/guardians of the children, and collecting their consent.</li> </ul> <p>No consent is asked from individuals inadvertently appearing in the background.</p> <p>No consent is asked for large group pictures with no person being the focal point of the picture. However it is explained that the group picture may be published, allowing persons to opt out and leave the group before the picture is taken.</p> <p>No consent is asked from high level public persons present in their official public role (e.g. a minister opening an 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>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 11)</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 if applicable rectified</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>

COMPLIANCE CHECK AND RISK SCREENING - Photos and video

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 time of 5 years is a reasonable time within which photos-video could be used for ETF publications</li> <li>• As short as possible</li> <li>• ETF has decided to extend the storage period of a representative set of photos and videos for historical purposes without time limit</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>• ETF photographer-video operator provides Privacy statement to potential subjects during assignment. Where possible, potential subjects are informed beforehand via email.</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>• No</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 <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Evaluation, automated decision- making or profiling <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Monitoring data subjects <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• New technologies that may be considered intrusive <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Exclusion databases <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• 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</li> <li>• Internet traffic analysis breaking encryption <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Management of personal files <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Staff evaluation procedures <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Staff selection procedures <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Establishment of rights upon entry into service <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Access control systems <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Video surveillance <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> </ul>
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C. Conclusions

	<b>Actor</b>	<b>Date</b>	<b>Signature</b>
27.	<p><b>Business owner</b> Alastair Macphail Head of Communication Department</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>		