

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

1.	Name of the processing operation	Publications
2.	Reference number/Issue	ETF-DPR-06/Issue 1
3.	Date	18/12/2018
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)	Controllers from any other body with whom ETF has publication agreements, e.g. Publications Office, international/ETF sister organisations
7.	Processor(s)	Outsourced contractors for writing, editing, layout/design, translation/cross language copy editing, publishing and printing
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken Email: DataProtectionOfficer@etf.europa.eu

9.	Purpose of the processing	To include in the publication information about authors, contributors, interviewees, citations, project participants and photographs of various individuals
10.	Legal basis for the processing	<ul style="list-style-type: none"> Regulation (Ec) No 1339/2008 of the European Parliament and of the Council of 16 December 2008 establishing a European Training Foundation (recast), Article 2 Functions ETF Publication Policy (ref. Directors decision ETF/14/DEC/002)
11.	Categories of data subjects	Authors, contributors, interviewees, project participants. Individuals whose photographs/videos may be included in the publication, for example events participants, students, professionals and members of the general public: see separate records on Photos and videos, and on Events. Publications may be distributed through mailing lists resulting from the stakeholders database: see separate record on Stakeholder relationships management
12.	Categories of personal data	Name, e-mail, institution and title Photographs In exceptional cases: telephone
13.	Time limits for keeping of data	Once published, personal data in both electronic and paper versions of publications will always be available. Personal data collected but not included in the final version of the publication is removed 5 years after the publishing date.

14.	Categories of ETF recipients of data	ETF editors/drafters, ETF communication officers
15.	Categories of external recipients of data	Outsourced contractors for writing, editing, layout/design, translation/cross language copy editing, publishing and printing Readers of final ETF publications

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16.	Transfers of data to third country or international organisation	Not applicable
17.	Technical and organisational security measures	Access to the systems used 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 (if not previously informed through other channels, e.g. privacy statements for events/photo and video shoots).

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> <ul style="list-style-type: none"> <input type="checkbox"/> Necessary for performance of tasks in the public interest attributed by EU or MS legislation <input checked="" type="checkbox"/> Necessary for the management and functioning of the organisation <input type="checkbox"/> Necessary for compliance with legal obligation incumbent on controller <input checked="" type="checkbox"/> Necessary for performance of a contract to which the data subject is party <input checked="" type="checkbox"/> The data subject has given consent <input type="checkbox"/> Necessary in order to protect the vital interests of the data subject or of another natural person 	<ol style="list-style-type: none"> 1. Authors: consent asked for any personal data other than name 2. Interviewees: yes, requested before interview 3. Individuals on pictures-video: yes, see Photos & Videos, Events records
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 11)</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 is validated by the ETF and if applicable rectified (the data subject is given the opportunity to validate, request modification e.g. interviews) • 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 	<ul style="list-style-type: none"> • The period of 5 years is to be able to manage requests for corrections after publication (requests are not likely to occur after five years) • As short as possible

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	possible"? <ul style="list-style-type: none"> In case you only need some information for longer, can you split storage periods? 	<ul style="list-style-type: none"> Not applicable
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"> Privacy statement is provided to authors/contributors at the assignment. Interviewees, project participants etc. receive privacy statements before being involved in activities 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 Evaluation, automated decision- making or profiling <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Monitoring data subjects <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No New technologies that may be considered intrusive <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Exclusion databases <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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 Internet traffic analysis breaking encryption <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Management of personal files <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Staff evaluation procedures <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Staff selection procedures <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Establishment of rights upon entry into service <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Access control systems <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Video surveillance <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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C. Conclusions

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27.	Business owner Alastair Macphail Head of Communication Department 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		