

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

1.	Name of the processing operation	<b>Website</b>
2.	Reference number/Issue	ETF-DPR-07/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)	
7.	Processor(s)	Outsourced contractors for management and hosting of the website
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken ETF (Deputy) Data protection officer Email: DataProtectionOfficer@etf.europa.eu

9.	Purpose of the processing	<p>Direct purposes</p> <ul style="list-style-type: none"> <li>• To enable email alert service</li> <li>• To monitor site usage (third party analytics cookies)</li> </ul> <p>Indirect purposes, for which the website itself does not collect any data, but acts as a gateway (documented in separate records, and not further detailed in this record):</p> <ul style="list-style-type: none"> <li>• To contact the ETF via functional email accounts, see records:           <ul style="list-style-type: none"> <li>◦ Info requests and questions from citizens</li> <li>◦ Public access to documents</li> </ul> </li> <li>• To handle applications for jobs, traineeships and secondments, see record Selection of staff, trainees, SNEs</li> <li>• To handle negotiated procurement procedures, see record Procurement procedures and contract management</li> <li>• To share ETF web pages through social media, or to connect to ETF on social media: see Social media information on website</li> <li>• Last but not least, the website may publish personal data resulting from other processing operations, see records:           <ul style="list-style-type: none"> <li>◦ Photos and videos</li> <li>◦ Publications</li> <li>◦ Declaration of commitment and interests</li> </ul> </li> </ul>
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	Members of the public browsing the ETF website
12.	Categories of personal data	Analytics cookies: Masked IP address and geo-location, Chronology and details of web site visit (e.g. date and time, pages, languages,

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		downloads), Local information (e.g. browser type and version, screen resolution)  Email alert service: email (obligatory), name
13.	Time limits for keeping of data	Analytics cookies: 13 months Email alert service: until un-subscription

14.	Categories of ETF recipients of data	ETF web master(s)
15.	Categories of external recipients of data	Outsourced contractors for management and hosting of the website
16.	Transfers of data to third country or international organisation	Not applicable

17.	Technical and organisational security measures	Access to the web site 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	In 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	<a href="#">Website</a>
Reference number	ETF-DPR-07/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 type="checkbox"/> Necessary for performance of tasks in the public interest attributed by EU or MS legislation</li> <li><input checked="" 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>	<p>No consent is requested from data subjects. However they may decide to opt out from use of cookies for analytics purposes</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 in cookies is automatically generated. Email data is provided by the data subject</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> </ul>	<ul style="list-style-type: none"> <li>• For Analytics, the time of 13 months allows to prepare yearly statistical analysis reports. For email alerts, currently the time is limited to the moment where the subscriber revokes his subscription, at which point his email is removed from the</li> </ul>

	<ul style="list-style-type: none"><li>• In case you only need some information for longer, can you split storage periods?</li></ul>	<ul style="list-style-type: none"><li>mail alert system.</li><li>• As short as possible</li><li>• Not applicable</li></ul>
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>• General web privacy statement, and specific cookies and social media statements, all available on the web site.</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>• No</li></ul>

## B. Risk screening

26.	<b>Does the processing involve any of the following?</b>	
	• 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

### C. Conclusions

Actor	Date	Signature
<p>27. <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>		

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