

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

1.	Name of the processing operation	Time recording
2.	Reference number/Issue	ETF-DPR-08/Issue 1
3.	Date	19/12/2018
4.	Business owner	Manuela Prina Head of Strategic Development Department ad interim Manuela.Prina@etf.europa.eu
5.	Controller	Cesare Onestini Director of the ETF Cesare.Onestini@etf.europa.eu
6.	Joint controller(s)	Not applicable
7.	Processor(s)	Not applicable
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu
9.	Purpose of the processing	The recording of a staff members time against activities defined in the annual work programme and department plans, allows for the monitoring and costing of the human resources spent on ETF activities, versus the original planning assumptions.in line with the Activity Based Management principles in place at the ETF.
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 13 Annual activity report, comma 2 ETF Financial Regulation 2013 (GB/13/DEC/014 of 16/12/2013), Article 29 Principles of economy, efficiency and effectiveness/ Principle of sound financial Management, and Article 47 Consolidated Annual Activity Report ETF Performance Management and annexed ETF Performance Planning, Measurement and Reporting Policy (ETF/17/DEC/005 of 26-04-2017)
11.	Categories of data subjects	ETF staff members and Seconded national experts.
12.	Categories of personal data	Staff member name and amount of time recorded on a given day on a given ETF activity.
13.	Time limits for keeping of data	5 years for detailed individual staff data in the time recording system (individual data is also visualised in aggregated form in the ABM system, Dashboard) No time limit for aggregated data at ETF and department level in ETF quarterly and annual reports for historical archiving.
14.	Categories of ETF recipients of data	<ul style="list-style-type: none"> Line managers: Aggregated (monthly) data of the individual staff members under their responsibility (through reporting module of the Time recording system) SDD Corporate performance officer: Detailed data of individual staff (directly in time recording system) ICT software technicians: Detailed data of individual staff (directly in time recording system)

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		<ul style="list-style-type: none"> • All staff: Aggregated totals of data (for the respective budgetary year) per activity and per individual, through the ABM system (ETF Dashboard)
15.	Categories of external recipients of data	<ul style="list-style-type: none"> • ETF Governing Board members have access to aggregated totals of data (for the respective budgetary year and per individual) per activity, through the ABM system (ETF Dashboard)
16.	Transfers of data to third country or international organisation	Not applicable

17.	Technical and organisational security measures	Access to the Time recording system and the ETF Dashboard system is limited to authorised actors via user authentication (ID and password).
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>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 checked="" type="checkbox"/> Necessary for compliance with legal obligation incumbent on controller <input type="checkbox"/> Necessary for performance of a contract to which the data subject is party <input 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 	
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)? 	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? 	Yes No
22.	<p>Accuracy (Point 12)</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"> • Accuracy depends mainly on the individual staff members' input. The SDD Corporate performance officer verifies on a quarterly basis, at aggregate level, the consistency of the recorded data. • If noticing unexplainable discrepancies, they will ask the relevant staff member to verify the correctness of their data and ensure eventual modification.
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 duration of 5 years is determined to have data available for ex-post evaluation/audit purposes. • As short as possible

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	<p>possible”?</p> <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.	<p>Transparency (Point 18)</p> <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 accessible from the Time recording and ETF Dashboard systems. In addition, Privacy statement is annexed to the “Guide to time recording” (which is distributed at each start of the new year). • Not applicable
25.	<p>Data subjects rights (Point 18)</p> <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 • Yes, as time recording is part of ETF’s ABM methodology, deleting time recording data is not foreseen. In the case of staff leaving the ETF, data may be anonymised, upon their request (ad-hoc measure).

B. Risk screening

26.	Does the processing involve any of the following?		
	• 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 checked="" type="checkbox"/> Yes	<input 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
27.	<p>Business owner Manuela Prina Head of Strategic Development Department ad interim</p> <p>Conclusion Threshold assessment required according to Risk screening</p>		
	<p>Data Protection Officer: Tiziana Ciccarone / Laurens Rijken</p> <p>Conclusion I confirm that a threshold assessment is required</p>		

III. THRESHOLD ASSESSMENT OF PERSONAL DATA PROCESSING OPERATION (Article 26 and 39 of Regulation (EU) No. 2018/1725)

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A. Criteria for high risks identification

28.	Systematic and extensive evaluation of personal aspects or scoring, including profiling and predicting	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
29.	Automated- decision making with legal or similar significant effect: processing that aims at taking decisions on data subjects	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
30.	Systematic monitoring : processing used to observe, monitor or control data subjects, especially in publicly accessible spaces. This may cover video-surveillance but also other monitoring, e.g. of staff internet use. The systematic monitoring concerns the calculation of distribution of staff members' time to different activities, in order to monitor and calculate the cost of the human resources spent on ETF activities, versus the original planning assumptions, at individual, department and ETF level. This information is used for Activity based management purposes, and has no relation with staff performance purposes such as appraisal, promotion etcetera.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
31.	Sensitive data : data revealing ethnic or racial origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data for identification purposes, data concerning health or sex life or sexual orientation, criminal convictions or offences and related security measures or otherwise considered sensitive.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
32.	Data processed on a large scale , whether based on number of people concerned and/or amount of data processed about each of them and/or permanence and/or geographical coverage	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
33.	Datasets matched or combined from different data processing operations performed for different purposes and/or by different data controllers in a way that would exceed the reasonable expectations of the data subject.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
34.	Data concerning vulnerable data subjects : situations where an imbalance in the relationship between the position of the data subject and the controller can be identified.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
35.	Innovative use or applying technological or organisational solutions that can	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	involve novel forms of data collection and usage. Indeed, the personal and social consequences of the deployment of a new technology may be unknown	
	
36.	Preventing data subjects from exercising a right or using a service or a contract.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	

B. Conclusion

	Actor	Date	Signature
37.	Business owner Manuela Prina Head of Strategic Development Department ad interim Conclusion No further action required despite the matching criteria for high risk identification. See justification below As described above, the monitoring is exclusively for the purpose of Activity Based Management		
	Data Protection Officer: Tiziana Ciccarone / Laurens Rijken Conclusion I confirm that no further action is required		
	Data Controller Cesare Onestini, Director of the ETF		