

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

1.	Name of the processing operation	Audits and evaluations
2.	Reference number/Issue	ETF-DPR-09/Issue 1
3.	Date	18/12/2018
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)	European Court of Auditors (ECA) Internal Audit Service of the European Commission (IAS)
7.	Processor(s)	External auditors/evaluators, contracted by ETF
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu

9.	Purpose of the processing	Auditors and evaluators require and/or collect staff personal data for and during interviews and meetings, and may also request aggregated time recording data (FTE) associated to the cost of the ETF Projects, to analyse the effectiveness and efficiency of ETF operations. They also can require ETF stakeholders data for the purpose of targeted surveys as part of the assignment They may also receive contractors personal data, when verifying that ETF revenue received by external entities, both private and public, and all expenditure incurred in approved ETF procurement actions has been administered in a lawful and regular manner with sound financial management
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 24 Evaluation 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, Article 46 Ex post controls, Article 82 Appointment and powers and duties of the internal auditor, and Article 111 On-the-spot checks by the Commission, the Court of Auditors and OLAF 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, contractual parties and tenderers, stakeholders
12.	Categories of personal data	Personal data of a) staff members such as name and surname, position and department, collected during interviews and meetings, and aggregated time recording data (FTE) associated to the cost of the ETF Projects, b) tenderers/contractors such as name and surname, c) ETF stakeholders (contacts) such as name, surname, email address for

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		the purpose of targeted surveys as part of the assignment.
13.	Time limits for keeping of data	7 years after conclusion of the audit/evaluation assignment
14.	Categories of ETF recipients of data	ETF management (data, in aggregated form, may be implicitly reported in audit/evaluation observations)
15.	Categories of external recipients of data	ETF Governing Board including the ETF parent DG (data, in aggregated form, may be implicitly reported in audit/evaluation observations)
16.	Transfers of data to third country or international organisation	Not applicable
17.	Technical and organisational security measures	<p>External auditors/evaluators receive data directly from the relevant SDD audit/evaluation officer, in tabular form. The data is generally aggregated, and/or anonymised. Only in exceptional cases will external auditors/evaluators have access to ETF systems containing the data, where they receive a username/password combination, with specific read only access. External auditors adhere to international auditing standards. In addition, the outsourcing contract contains specific clauses governing the treatment of confidential and personal data.</p> <p>The European Court of Auditors and the Internal Audit Service of the European Commission receive access to all the data and information, including data and information in electronic format, needed in order to conduct their audits. For access to ETF systems containing the data, they receive a username/password combination, with specific read only access.</p>
18.	Information to the data subject	Privacy statement and ad-hoc

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.	Lawfulness (Legal basis and necessity for processing, point 10) <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"/> Necessary in order to protect the vital interests of the data subject or of another natural person 	
	<input checked="" type="checkbox"/> The data subject has given consent	Staff members, contractual parties and tenderers: no consent required. Stakeholders: specific consent is asked as part of the registration in the Corporate contacts database procedure
20.	Purpose definition (Point 9) <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.	Data minimisation (Point 12) <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.	Accuracy (Point 12) <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"> • Information/data comes from existing ETF systems which have undergone the necessary controls and correction actions • Should an inaccuracy be signalled, a check will take place and followed by correction
23.	Storage limitation (Point 13)	<ul style="list-style-type: none"> • The duration of 7 years is determined by

COMPLIANCE CHECK AND RISK SCREENING - Audits and evaluations

	<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 possible”? In case you only need some information for longer, can you split storage periods? 	<p>the European Commission Administrative retention period for Evaluation, internal control and other monitoring and risk management actions</p> <ul style="list-style-type: none"> As short as necessary 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"> Staff members are informed about the potential processing of their personal data in the case of IAS audits (Privacy notice provided by IAS, forwarded to staff by SDD). Staff members are informed by the SDD about processing of personal data by external evaluators, on a case-by-case basis, determined by the context of the evaluation, with link to Privacy statement. Contractual parties and tenderers are informed of possible data processing in the Privacy statement annexed to the procurement procedure. Stakeholders are informed in the Privacy statement of the Corporate contacts database 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 In the case of request concerning accessing data related to ECA/IAS audits, the request will be forwarded to ECA/IAS and may receive a negative response.

B. Risk screening

26.	<p>Does the processing involve any of the following?</p> <ul style="list-style-type: none"> Data relating to health, (suspected) criminal offences or otherwise considered sensitive Evaluation, automated decision- making or profiling Monitoring data subjects New technologies that may be considered intrusive Exclusion databases Large-scale processing of special categories of personal data (disease surveillance, pharmacovigilance, central databases for law-enforcement cooperation) Internet traffic analysis breaking encryption Management of personal files Staff evaluation procedures Staff selection procedures Establishment of rights upon entry into service Access control systems Video surveillance 	<div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div>
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C. Conclusions

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27.	Business owner Manuela Prina Head of Strategic Development Department ad interim 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		