

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

1.	Name of the processing operation	Electronic communication monitoring
2.	Reference number/Issue	ETF-DPR-19/Issue 1
3.	Date	18/12/2018
4.	Buisness owner	Michael Reiner ICT Team Leader michael.reiner@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	Real time monitoring in Firewall to ensure highest ICT security level for ETF ICT infrastructure, the virtual desktops and devices connected. The latter include private devices connected to the ETF wifi network, and also devices used by staff outside the ETF, when using remote access to the virtual desktop and email.
10.	Legal basis for the processing	Electronic Communication policy, adopted by MT 29.7.2008
11.	Categories of data subjects	ETF staff, SNEs, interim workers, trainees.
12.	Categories of personal data	<ul style="list-style-type: none"> Normal monitoring: Date, Time, IP address source, IP address destination, application used. In case of investigation of security incidents (with identified need to know): indirect matching of IP address to virtual desktop session and related ETF staff member may occur
13.	Time limits for keeping of data	Firewall keeps about 50 days of traffic logs (automatically overwritten oldest entries)

14.	Categories of ETF recipients of data	Designed members of ICT Team
15.	Categories of external recipients of data	In case of security investigation, ETF may transfer monitoring logs to external experts (in particular, CERT-EU)
16.	Transfers of data to third country or international organisation	Not applicable

17.	Technical and organisational security measures	Details not disclosed
18.	Information to the data subject	Provided in the privacy statement