

ETF MOBILE DEVICE USE

Key information

Controller

Cesare Onestini, Director of the ETF, Cesare.Onestini@etf.europa.eu

Business owner

Michael Reiner, ICT Team Leader, michael.reiner@etf.europa.eu

Data protection officer

Tiziana Ciccarone / Laurens Rijken, [DataProtectionOfficer@etf.europa.eu](mailto>DataProtectionOfficer@etf.europa.eu)

Purpose of the processing

The purpose of processing is twofold:

- 1) Management of the lifecycle (inventory) of mobile devices.
- 2) Configuration of email on mobile phone, and management of mobile phones for security purposes
- 3) Monitoring of volume of data traffic on mobile phones

Legal basis

The legal basis for the processing operations of personal data is the Electronic Communication policy, adopted by MT 29.7.2008

Personal data

Personal data concerned are:

- 1) For inventory of mobile devices which includes for every device, at least: device identification and, where applicable, SIM identification; status of the device (e.g.: new, in maintenance, assigned, to be disposed of...); user to which the device is allocated, with begin and end time of allocation where appropriate (e.g. temporary allocated pool devices)
- 2) For mobile phones: ETF email, and in addition any contacts and personal data in social media apps (whatsapp, facebook, twitter etc) used by staff member on the mobile phones. These latter data are not further managed or monitored by ICT.
- 3) MDM of mobile phones assigned full time to staff member (not the “portable pool”): staff member name and email address
- 4) For data traffic monitoring: mobile country code (MCC, based on GPS coordinates), length (time) of data connection, volume of data connection, SIM used, data connection type (roaming or wifi)

Recipients of the personal data

For all purposes detailed above, access to personal data is provided to the ICT Service Desk. For mobile phones MDM and Data traffic, related personal data is also processed by the external telecom contractor.

Further information

Data retention

Data collected will be retained for

- 1) For inventory: One year after end of lifecycle for inventory data
- 2) For mobile phones: Duration of loan of mobile phones
- 3) For MDM: Duration of assignment pf the mobile phone
- 4) For traffic data: One year after end of calendar year

Right of access, rectification or erasure, restriction, objection

Any request to access, rectify or erase personal data, or to restrict or object to the processing of personal data shall be addressed in writing to the Michael Reiner; ICT Team Leader; michael.reiner@etf.europa.eu.

Right to lodge complaint

Data subjects can at any time lodge a complaint on the processing of their personal data to the ETF Data Protection Officer ([DataProtectionOfficer@etf.europa.eu](mailto>DataProtectionOfficer@etf.europa.eu)) or to the European Data Protection Supervisor (<http://www.edps.europa.eu>).