

## I. RECORD OF PERSONAL DATA PROCESSING OPERATION (Article 26 and 39 of Regulation (EU) No. 2018/1725)

1.	Name of the processing operation	<b>ETF Mobile Device use</b>
2.	Reference number/Issue	ETF-DPR-20/Issue 2
3.	Date	20/09/2019
4.	Business 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)	The external telecom contractor processes data providing the following services: <ul style="list-style-type: none"> <li>Monitoring and analysing mobile phone volume of data traffic</li> <li>Mobile device management (MDM)</li> </ul>
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu

9.	Purpose of the processing	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
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	1) For inventory of all mobile devices (including laptops and mobile phones in the portable “pool”), 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)
13.	Time limits for keeping of data	1) One year after end of lifecycle for inventory data 2) Duration of loan of mobile phones 3) Duration of assignment pf the mobile phone 4) One year after end of calendar year

14.	Categories of ETF recipients of data	ICT Service Desk
15.	Categories of external	Telecom service provider

COMPLIANCE CHECK AND RISK SCREENING - ETF Mobile Device use

	recipients of data	
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	Privacy statement