

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

1.	Name of the processing operation	ETF telephone billing
2.	Reference number/Issue	ETF-DPR-21/Issue 1
3.	Date	19/12/2018
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)	Not applicable
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu
9.	Purpose of the processing	The recovery of costs of private telephone calls from fixed office phone through deduction from monthly salary
10.	Legal basis for the processing	Electronic Communication policy, adopted by MT 29.7.2008, section III.D, Allowable Uses
11.	Categories of data subjects	ETF staff, SNEs, interim workers, trainees.
12.	Categories of personal data	Name, date, hour, duration and masked phone number called
13.	Time limits for keeping of data	Six months
14.	Categories of ETF recipients of data	HR staff, for recovery of costs ICT Service Desk for administration of the telephone system
15.	Categories of external recipients of data	Not applicable
16.	Transfers of data to third country or international organisation	Not applicable
17.	Technical and organisational security measures	Access to the telephone management system is restricted to the ICT service desk staff and the use is secured with individual username-password. The system sends automated (monthly) emails to the staff member and the HR functional email account which is restricted to HR staff, and access is secured with username-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 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)? 	<ul style="list-style-type: none"> • 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? 	<ul style="list-style-type: none"> • 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"> • Data is automatically generated by telephone system. • Staff can review and indicate necessary corrections which after a check will be implemented
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 possible"? • In case you only need some information for longer, can you split storage periods? 	<ul style="list-style-type: none"> • 6 months is a reasonable time within which any dispute can be started and settled • As short as possible • Not applicable

24.	Transparency (Point 18) <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"> Link to privacy statement in automated emails Not applicable
25.	Data subjects rights (Point 18) <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 particular, for correction of private calls, people can contact directly HR through functional HR email (mailto:Rights&obligations@etf.europa.eu) Not applicable

B. Risk screening

26.	Does the processing involve any of the following? <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 	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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C. Conclusions

	Actor	Date	Signature
27.	Business owner Michael Reiner ICT Team Leader Conclusion Threshold assessment required according to Risk screening		
	Data Protection Officer: Tiziana Ciccarone / Laurens Rijken Conclusion I confirm that a threshold assessment is required		

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. ...	<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 involve novel forms of data collection and usage. Indeed, the personal and social consequences of the deployment of a new technology may be unknown	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

36.	<p>Preventing data subjects from exercising a right or using a service or a contract. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>....</p>

B. Conclusion

	Actor	Date	Signature
37.	<p>Business owner Michael Reiner ICT Team Leader</p> <p>Conclusion No further action required despitely the matching criteria for high risk identification. See justification below</p> <p>The level of monitoring is restricted to the tracking of telephone calls marked as private. Privacy is ensured through masking of the telephone number.</p>		
	<p>Data Protection Officer: Tiziana Ciccarone / Laurens Rijken</p> <p>Conclusion I confirm that no further action is required</p>		
	<p>Data Controller Cesare Onestini, Director of the ETF</p>		