

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

1.	Name of the processing operation	Registration of externals
2.	Reference number/Issue	ETF-DPR-23/Issue 1
3.	Date	18/12/2018
4.	Business owner	Renata Vallome ETF Security Officer and Facilities Coordinator Renata.Vallome@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)	ETF Contractor: Guards and Receptionist
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu
9.	Purpose of the processing	To have inventory of external people (e.g. temporary workers, SNEs, trainees and visitors) present on site for security and safety purposes (e.g. evacuation, incident, accident). A further processing of data might be envisaged in case an event / accident occurs and other actors (e.g. insurance companies, local authorities of public security) shall be involved.
10.	Legal basis for the processing	ETF building security policy (ref. ETF/18/DEC/010), Annex 2 Access to building procedure
11.	Categories of data subjects	Any external people (e.g. temporary workers, trainees, visitors).
12.	Categories of personal data	Name, ETF contact person, organisation, country, document type and related data, car type and number plate
13.	Time limits for keeping of data	One year from the collection of data and last visit.
14.	Categories of ETF recipients of data	ETF Facilities Team members, Crisis Management Team, ETF Staff copied in the related e-request of access to the building
15.	Categories of external recipients of data	ETF Contractor: Guards and Receptionist Optional, in particular cases: Insurance companies; Local Authorities of public security
16.	Transfers of data to third country or international organisation	Not applicable
17.	Technical and organisational security measures	Database accessible only to those in charge of data collection with user name and 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)

Name of the processing operation	Registration of externals
Reference number	ETF-DPR-23/Issue 1
Date	20/04/2018

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"/> 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.	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 • Yes
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"> • Data is taken from ID document. • Inaccurate information are rectified by actors when errors are spotted or as applicable, upon request of data subjects
23.	Storage limitation (Point 13) <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"> • The period identified for storage allows the implementation of any potential action to be carried out (e.g. insurance claim). • 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 	<ul style="list-style-type: none"> • Privacy Statement is provided by the ETF Contractor: Guards and Receptionists, when implementing relevant registration activities.

COMPLIANCE CHECK AND RISK SCREENING - Registration of externals

	inform them after the fact), consult your DPO	<ul style="list-style-type: none"> 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"> The data subject can request access to his/her data at any time, including rectification or deletion. Those requests will be checked and accepted only if compliant with the regulatory framework.

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 <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Evaluation, automated decision- making or profiling <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Monitoring data subjects <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No New technologies that may be considered intrusive <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Exclusion databases <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Large-scale processing of special categories of personal data (disease surveillance, pharmacovigilance, central databases for law-enforcement cooperation) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Internet traffic analysis breaking encryption <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Management of personal files <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Staff evaluation procedures <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Staff selection procedures <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Establishment of rights upon entry into service <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Access control systems <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Video surveillance <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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C. Conclusions

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27.	Business owner Renata Vallome ETF Security Officer and Facilities Coordinator 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		