

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

1.	Name of the processing operation	Facility Services Information System
2.	Reference number/Issue	ETF-DPR-25/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 for facility management
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu

9.	Purpose of the processing	To provide, upon staff ¹ request, support and maintenance services
10.	Legal basis for the processing	ETF Building Security Policy (ETF/18/DEC/010)
11.	Categories of data subjects	ETF Staff, interim workers, trainees and SNEs
12.	Categories of personal data	Name, office number, office telephone number, office e-mail address
13.	Time limits for keeping of data	Up to the duration of the employment/traineeship contract

14.	Categories of ETF recipients of data	ETF Facilities Team members, ETF Head of Resources & Services Department (as back-up)
15.	Categories of external recipients of data	ETF Contractor for facility management
16.	Transfers of data to third country or international organisation	Not applicable

17.	Technical and organisational security measures	Data are collected in a database accessible only to those in charge of data collection and management with user name and password
18.	Information to the data subject	Privacy statement

¹ Including interim workers, trainees and SNEs

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 • Not applicable
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 taken from the list of the ETF Staff, interim workers, trainees and SNEs provided by HR. • Inaccurate information are rectified by actors when errors are notified
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"> • Data are kept for the duration of the employment/traineeship contract as they are necessary for requesting maintenance and/or support services • As short as possible • Not applicable

24.	<p>Transparency (Point 18)</p> <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"> Information to data subjects is provided when entering into service through the ETF relevant induction programmes and in the course of service through the Privacy statement on the home page of the relevant system Not applicable
25.	<p>Data subjects rights (Point 18)</p> <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 Assessment of requests shall be made on ad hoc basis as it might be not possible to erase data which are functional to the state of active employment of staff.

B. Risk screening

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

C. Conclusions

	Actor	Date	Signature
27.	<p>Business owner Renata Vallome ETF Security Officer and Facilities Coordinator</p> <p>Conclusion No further action required</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>		

