

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

1.	Name of the processing operation	Staff access and presence management
2.	Reference number/Issue	ETF-DPR-26/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	<ul style="list-style-type: none"> To allow ETF staff to access the building, to authorise access outside normal office hours, and to allow access to restricted areas, through the use of an ID proximity badge. To have inventory of staff on ETF premises in case of emergency situations, using ETF badge in/badge out system. <p>Further processing:</p> <ul style="list-style-type: none"> In case an event / accident occurs, other actors (e.g. insurance companies, local authorities of public security) may be provided access to log files.
10.	Legal basis for the processing	Building Security Policy (ETF/18/DEC/010) ETF Health and Safety Policy (ETF/16/DEC/007)
11.	Categories of data subjects	ETF Staff members, Interim workers, SNEs, trainees.
12.	Categories of personal data	<ul style="list-style-type: none"> Name, badge number in the system and on the ID proximity badge. Picture and personnel number (not recorded within the system, but displayed on ID proximity badge)
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
15.	Categories of external recipients of data	ETF Contractors: Guards, Receptionist and system's technicians
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

THRESHOLD ASSESSMENT - Staff access and presence management