

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

1.	Name of the processing operation	Info requests and questions from citizens
2.	Reference number/Issue	ETF-DPR-30/Issue 1
3.	Date	18/12/2018
4.	Business owner	Alastair Macphail Head of Communications department Alastair.Macphail@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 purpose of collecting personal data is to manage and reply to requests for information
10.	Legal basis for the processing	ETF Code of Good Administrative Behaviour (ref. ETF/01/DEC/001) in particular article 4 Dealing with enquiries
11.	Categories of data subjects	Requestors of information
12.	Categories of personal data	Name, e-mail, any other personal data provided by the requestor
13.	Time limits for keeping of data	Data are kept for two years from the closure of the request for information
14.	Categories of ETF recipients of data	ETF communication officers
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 functional email account is limited the ETF communication officers via user authentication (ID and password)
18.	Information to the data subject	Provided in the 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	Info requests and questions from citizens
Reference number	ETF-DPR-30/Issue 1
Date	18/12/2018

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 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 • Not applicable
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 received from data subjects. • As the presence of an inaccurate information is signalled, a check is put in place and as applicable relevant rectification is made
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 	<ul style="list-style-type: none"> • The 2 years storage period is determined as a reasonable amount of time allowing to ETF or requestor to refer to a previous request for information • As short as possible • Not applicable

COMPLIANCE CHECK AND RISK SCREENING - Info requests and questions from citizens

	longer, can you split storage periods?	
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"> A privacy statement is available on the Contact us section of the ETF website, and within the quick enquiry form. In addition, the privacy statement is provided by the ETF Communication officer when replying to individual requests arriving via fax-paper mail. 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. 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 <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
-----	--

C. Conclusions

	Actor	Date	Signature
27.	Business owner Alastair Macphail Head of Communications department 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		

