

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

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| 1. | Name of the processing operation | Declaration of commitment and interests |
| 2. | Reference number/Issue | ETF-DPR-37/Issue 2 |
| 3. | Date | 08/03/2021 |
| 4. | Business owner | Cesare Onestini Director Cesare.Onestini@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 |

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| 9. | Purpose of the processing | The purpose of collecting and publishing the personal data in Declarations of Commitment and Interests (DCI) and Curriculum Vitae's (CV's) of Governing Board (GB) members, the ETF Director and ETF managers is to ensure that these actors commit to act in the public interest and independently of any external influence. |
| 10. | Legal basis for the processing | <ul style="list-style-type: none"> Regulation (EC) No. 1339/2008 of the European Parliament and of the council of 16 December 2008 establishing a European Training foundation (recast) article 11 The ETF Governing Board Decision ref. GB/09/DEC/017 on the 'Rules of Procedure of the Governing Board': article 1, comma 6 and Annex 1 Part 1 on Functions and powers of Governing Board members The ETF Governing Board Decision ref. GB/19/DEC/003 on the 'Procedure for the Collection and Publication of Declarations of Commitment and Interests and CVs' |
| 11. | Categories of data subjects | ETF Governing Board members ETF Director and managers |
| 12. | Categories of personal data | <ul style="list-style-type: none"> Name and signature (signature not published on ETF web) Direct interests and indirect financial interests of the actor Interests deriving from the professional activities of the actor or his/her close family members Any membership role or affiliation in organisations/bodies/clubs with an interest in the work of ETF Other interests or facts that the actor considers pertinent. Curriculum Vitae of the actor |
| 13. | Time limits for keeping of data | 5 years after the discharge by European Parliament of the ETF budget of the respective year (Overall 7 years) |

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| 14. | Categories of ETF recipients of data | <ul style="list-style-type: none"> GB secretariat (before publication on web) All staff (DCI and CV published on ETF web, without signature) |
| 15. | Categories of external recipients of data | <ul style="list-style-type: none"> Public (DCI and CV published on ETF web, without signature) |

RECORD OF PERSONAL DATA PROCESSING OPERATION - Declaration of commitment and interests

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| 16. | Transfers of data to third country or international organisation | No |
| 17. | Technical and organisational security measures | Collected Declarations and CVs are stored on internal SharePoint area of ETF. Published declarations and CVs are on ETF website. Publication, modification, cancellation only possible by ETF web manager with restricted access through user-password. |
| 18. | Information to the data subject | Data protection disclaimer on declaration form and 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

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| 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 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 checked="" 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 | <p>No consent is required for the collection of the personal data (declaration of commitment and interests, CV).</p> <p>Specific consent is asked for the publication of the declaration of commitment and interests and the CV on the ETF website.</p> |
| 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"> • ETF Governing Board Secretariat assesses collected declarations and CVs and may return to data subject for clarification/improvement. • Any incorrect data will be modified |
| 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"> • The duration of 5 years after discharge is a legal requirement • As short as necessary • Not applicable |
| 24. | <p>Transparency (Point 18)</p> <ul style="list-style-type: none"> • How do you tell people about your | <ul style="list-style-type: none"> • Data protection disclaimer on form • Not applicable |

COMPLIANCE CHECK AND RISK SCREENING - Declaration of commitment and interests

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| | <p>processing?</p> <ul style="list-style-type: none"> If you do not want to inform people (or only inform them after the fact), consult your DPO | |
| 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 No |

B. Risk screening

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| 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 <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 |
| | <ul style="list-style-type: none"> 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 E-recruitment tools automatically pre-selecting/excluding candidates without human intervention <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | <ul style="list-style-type: none"> Management of personal files <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Staff evaluation procedures (annual appraisal) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 360° evaluations for helping staff members develop training plans <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 Management of leave, flexitime and telework <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Access control systems (non biometric) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Video surveillance (limited scale) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

C. Conclusions

| | Actor | Date | Signature |
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| 27. | <p>Business owner Cesare Onestini Director Conclusion No further action required</p> | 8-3-2021 | Email validation |
| | <p>Data Protection Officer: Tiziana Ciccarone / Laurens Rijken Conclusion I confirm that no further action is required</p> | 8-3-2021 | Email validation |
| | <p>Data Controller Cesare Onestini, Director of the ETF</p> | 8-3-2021 | Email validation |