

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

1.	Name of the processing operation	<b>Special ID cards, EC laissez passer and VAT exemptions</b>
2.	Reference number/Issue	ETF-DPR-38/Issue 1
3.	Date	18/12/2018
4.	Busines owner	Nadège Perrine Head of HR Unit Nadège.Perrine@etf.europa.eu
5.	Controller	Cesare Onestini Director of the ETF <a href="mailto:Cesare.Onestini@etf.europa.eu">Cesare.Onestini@etf.europa.eu</a>
6.	Joint controller(s)	DG HR, Italian Ministry of Foreign Affairs
7.	Processor(s)	Not applicable
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken <a href="mailto:DataProtectionOfficer@etf.europa.eu">DataProtectionOfficer@etf.europa.eu</a>

9.	Purpose of the processing	To provide ETF statutory staff with: <ul style="list-style-type: none"> <li>• EC (laissez passer) badges issued by the European Commission.</li> <li>• Special ID cards and VAT exemptions issued by Italian Ministry of Foreign Affairs</li> </ul>
10.	Legal basis for the processing	<ul style="list-style-type: none"> <li>• SLA with DG HR for EC badges</li> <li>• Seat Agreement with the Italian Government for special ID cards and VAT exemptions (Law n.90 of 5 June 2012)</li> </ul>
11.	Categories of data subjects	All ETF Temporary and Contract staff and Local Agents
12.	Categories of personal data	<ul style="list-style-type: none"> <li>• Staff member: name, contact details, nationality, birth date, gender, place of residence, marital status</li> <li>• Spouse/recognised partner: name, nationality, age, gender, residence</li> <li>• Dependent child/person/relative: name, nationality, birth date and gender</li> </ul>
13.	Time limits for keeping of data	<ul style="list-style-type: none"> <li>• 1 year after the payment of the debit note to DG HR for the application forms for the EC badges;</li> <li>• Until termination of service for the application forms for special ID cards and VAT exemptions</li> </ul>

14.	Categories of ETF recipients of data	HR Officers in charge
15.	Categories of external recipients of data	Personal data are provided to counterparts in other EU Institutions eg DG HR, as well as to Italian relevant authorities eg Italian Ministry of Foreign Affairs.
16.	Transfers of data to third country or international organisation	Not applicable

17.	Technical and organisational security	All application forms and salary instructions are stored in safes, which are located in the offices of the HR Officers in charge.
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	measures	
18.	Information to the data subject	Provided in privacy statement.
19.	Consent by data subject	Not applicable

## 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	<b>Special ID cards, EC laissez passer and VAT exemptions</b>
Reference number	ETF-DPR-38/Issue 1
Date	18/12/2018

### A. Compliance check

20.	<b>Lawfulness</b> (Legal basis and necessity for processing, point 10) <ul style="list-style-type: none"> <li><input type="checkbox"/> Necessary for performance of tasks in the public interest attributed by EU or MS legislation</li> <li><input checked="" type="checkbox"/> Necessary for the management and functioning of the organisation</li> <li><input checked="" type="checkbox"/> Necessary for compliance with legal obligation incumbent on controller</li> <li><input type="checkbox"/> Necessary for performance of a contract to which the data subject is party</li> <li><input type="checkbox"/> The data subject has given consent</li> <li><input type="checkbox"/> Necessary in order to protect the vital interests of the data subject or of another natural person</li> </ul>	
21.	<b>Purpose definition</b> (Point 9) <ul style="list-style-type: none"> <li>Do you list all purposes?</li> <li>Are the purposes specified, explicit, legitimate?</li> <li>Where information is also processed for other purposes, are you sure that these are not incompatible with the initial purpose(s)?</li> </ul>	<ul style="list-style-type: none"> <li>Yes</li> <li>Yes</li> <li>Not applicable</li> </ul>
22.	<b>Data minimisation</b> (Point 12) <ul style="list-style-type: none"> <li>Do you really need all data items you plan to collect?</li> <li>Are there any you could do without?</li> </ul>	<ul style="list-style-type: none"> <li>Yes</li> <li>No</li> </ul>
23.	<b>Accuracy</b> (Point 12) <ul style="list-style-type: none"> <li>How do you ensure that the information you process about people is accurate?</li> <li>How do you rectify inaccurate information?</li> </ul>	<ul style="list-style-type: none"> <li>HR rely on information provided and, in case of doubts, probe the staff and ask for further supporting documents.</li> <li>Information deemed to be inaccurate are promptly rectified by HR.</li> </ul>
24.	<b>Storage limitation</b> (Point 13) <ul style="list-style-type: none"> <li>Explain why you chose the storage period(s) mentioned</li> <li>Are they limited according to the maximum or minimum "as long as necessary, as short as possible"?</li> <li>In case you only need some information for</li> </ul>	<ul style="list-style-type: none"> <li>All different storage periods have been established in order to comply with payment verifications and audit controls.</li> <li>As short as possible</li> <li>Not applicable</li> </ul>

	longer, can you split storage periods	
25.	<b>Transparency</b> (Point 18) <ul style="list-style-type: none"> <li>How do you tell people about your processing?</li> <li>If you do not want to inform people (or only inform them after the fact), consult your DPO</li> </ul>	<ul style="list-style-type: none"> <li>Information is given to the data subject via a privacy statement, which is handed over during the first induction session on staff rights</li> <li>Not applicable</li> </ul>
26.	<b>Data subjects rights</b> (Point 18) <ul style="list-style-type: none"> <li>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?</li> <li>Could there be situations where you would want to refuse e.g. granting access? In case so please describe them</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>Not applicable</li> </ul>

## B. Risk screening

27.	<b>Does the processing involve any of the following?</b> <ul style="list-style-type: none"> <li>Data relating to health, (suspected) criminal offences or otherwise considered sensitive <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>Evaluation, automated decision- making or profiling <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>Monitoring data subjects <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>New technologies that may be considered intrusive <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>Exclusion databases <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>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</li> <li>Internet traffic analysis breaking encryption <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>Management of personal files <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>Staff evaluation procedures <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>Staff selection procedures <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>Establishment of rights upon entry into service <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>Access control systems <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>Video surveillance <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> </ul>	
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## C. Conclusions

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28.	<b>Business owner</b> Nadège Perrine Head of HR Unit  <b>Conclusion</b> No further action required		
	<b>Data Protection Officer:</b> Tiziana Ciccarone  <b>Conclusion</b> I confirm that no further action is required		
	<b>Director of the ETF</b> Cesare Onestini		

