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

1.	Name of the processing operation	**Travel management**
2.	Reference number/Issue	ETF-DPR-39/Issue 1
3.	Date	18/12/2018
4.	Business owner	Henrik Faudel Head of Administration Department Henrik.Faudel@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)	Travel agency Company providing corporate credit cards
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu

9.	Purpose of the processing	The purposes of processing data are: – Arranging missions for ETF staff and Seconded National Experts, including travel, accommodation, interpretation, visa and the reimbursement of their costs – Requesting and obtaining the ETF corporate credit card In addition to the above mentioned processing, personal data (restricted to e-mail address) may be used for customer satisfaction surveys, under the ETF authorisation/supervision, by the ETF travel agency.
10.	Legal basis for the processing	Decision of the ETF Governing Board ref. GB/18/DEC/003 of (28/03/2018) on the adoption of implementing rules to the Staff Regulations – Guide to missions and authorised travel Decision of the ETF Director ref. ETF/18/DEC/002 (28/03/2018) on the use of taxis and private cars on mission
11.	Categories of data subjects	ETF staff and Seconded National Experts
12.	Categories of personal data	For arrangement of missions: Name, e-mail address (optional data for the traveller profile: date of birth, gender and other voluntary provided details) For visa requests: passport details For corporate credit card requests: bank account number, ID details, ETF contract expiry date.
13.	Time limits for keeping of data	Data are kept for 7 years

14.	Categories of ETF recipients of data	Staff's line manager and Authorising Officer (if different from line manager), mission claim assessors, actors in the financial circuit, ETF Security Officer, HR leave and absence manager and ICT software technician for maintenance and technical support
15.	Categories of external recipients of data	Travel agency Company providing corporate credit cards
16.	Transfers of data to third	Not applicable

	country or international organisation	

17.	Technical and organisational security measures	Access to the ETF TRAMS system is limited to authorised actors via user authentication (ID and password). It is the responsibility of the staff member to hide personal data (e.g. credit card details, bank account number, ID details, private address) present in supporting documents of mission claims
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	**Travel management**
Reference number	ETF-DPR-39/Issue 1
Date	18/12/2018

A.   Compliance check

20.	**Lawfulness** (Legal basis and necessity for processing, point 10) ☐ Necessary for performance of tasks in the public interest attributed by EU or MS legislation ☒ Necessary for the management and functioning of the organisation ☒ Necessary for compliance with legal obligation incumbent on controller ☐ Necessary for performance of a contract to which the data subject is party ☐ The data subject has given consent ☐ Necessary in order to protect the vital interests of the data subject or of another natural person	
21.	**Purpose definition** (Point 9) • 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)?	• Yes • Yes • Yes
22.	**Data minimisation** (Point 12) • Do you really need all data items you plan to collect? • Are there any you could do without?	• Yes • No
23.	**Accuracy** (Point 12) • How do you ensure that the information you process about people is accurate? • How do you rectify inaccurate information?	• Information is provided by the data subject • As the presence of an inaccurate information is signalled, a check is put in place and as applicable relevant rectification is made.
24.	**Storage limitation** (Point 13) • 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	• In accordance with the ETF Financial Regulation, data shall be kept for five years upon the European Parliament discharge for the relevant budgetary year • As short as possible • Not applicable

	longer, can you split storage periods?	
25.	**Transparency** (Point 18) • 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	• Privacy statement provided during the dedicated induction session on missions and TRAMS, and also available in TRAMS • Not applicable
26.	**Data subjects rights** (Point 18) • 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	• Yes • Not applicable

B.   Risk screening

27.	**Does the processing involve any of the following?**		
	• Data relating to health, (suspected) criminal offences or otherwise considered sensitive	☐ Yes	☒ No
	• Evaluation, automated decision- making or profiling	☐ Yes	☒ No
	• Monitoring data subjects	☐ Yes	☒ No
	• New technologies that may be considered intrusive	☐ Yes	☒ No
	• Exclusion databases	☐ Yes	☒ No
	• Large-scale processing of special categories of personal data (disease surveillance, pharmacovigilance, central databases for law-enforcement cooperation)	☐ Yes	☒ No
	• Internet traffic analysis breaking encryption	☐ Yes	☒ No
	• Management of personal files	☐ Yes	☒ No
	• Staff evaluation procedures	☐ Yes	☒ No
	• Staff selection procedures	☐ Yes	☒ No
	• Establishment of rights upon entry into service	☐ Yes	☒ No
	• Access control systems	☐ Yes	☒ No
	• Video surveillance	☐ Yes	☒ No

C.   Conclusions

	Actor	Date	Signature
28.	**Business owner** Henrik Faudel Head of Administration 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 (This row is to be deleted in case of threshold assessment)		