

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

1.	Name of the processing operation	<b>Staff rights administration</b>
2.	Reference number/Issue	ETF-DPR-41/Issue 1
3.	Date	18/12/2018
4.	Busines owner	Nadège Perrine Head of HR Unit <a href="mailto:Nadège.Perrine@etf.europa.eu">Nadège.Perrine@etf.europa.eu</a>
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)	PMO, JSIS
7.	Processor(s)	
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	Manage staff rights related to salaries and allowances, medical coverage in cooperation with the European Commission
10.	Legal basis for the processing	<ul style="list-style-type: none"> <li>Service level agreement with PMO for salaries and allowances</li> <li>Art. 72 and 73 of the Staff Regulations for medical coverage</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, date of birth, gender, place of residence, marital status, financial allowances paid by another source, financial obligations towards third parties</li> <li>Spouse/recognised partner: name, nationality, date of birth, gender, residence, income, administrative status vis-à-vis employer, details of the employer</li> <li>Dependent child/person/relative: name, nationality, date of birth and gender</li> </ul>
13.	Time limits for keeping of data	<ul style="list-style-type: none"> <li>30 years after termination of service for the salary instructions to PMO;</li> <li>1 year after the enrolment to JSIS for the application forms for the medical coverage;</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 i.e. PMO, JSIS
16.	Transfers of data to third country or international organisation	Not applicable

17.	Technical and organisational security measures	All application forms and salary instructions are stored in safes, which are located in the offices of the HR Officers in charge.
18.	Information to the data	Provided in privacy statement.

RECORD OF PERSONAL DATA PROCESSING OPERATION - Staff rights administration

	subject	
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## 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>Staff rights administration</b>
Reference number	ETF-DPR-41/Issue 1
Date	18/12/2018

### A. Compliance check

19.	<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>	
20.	<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>
21.	<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>
22.	<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>
23.	<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 longer, can you split storage periods</li> </ul>	<ul style="list-style-type: none"> <li>All different storage periods have been established in order to comply with.</li> <li>As short as possible</li> <li>Not applicable</li> </ul>

## COMPLIANCE CHECK AND RISK SCREENING - Staff rights administration

24.	<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>
25.	<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

26.	<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</li> </ul>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> <li>Evaluation, automated decision- making or profiling</li> </ul>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> <li>Monitoring data subjects</li> </ul>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> <li>New technologies that may be considered intrusive</li> </ul>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> <li>Exclusion databases</li> </ul>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> <li>Large-scale processing of special categories of personal data (disease surveillance, pharmacovigilance, central databases for law-enforcement cooperation)</li> </ul>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> <li>Internet traffic analysis breaking encryption</li> </ul>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> <li>Management of personal files</li> </ul>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> <li>Staff evaluation procedures</li> </ul>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> <li>Staff selection procedures</li> </ul>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> <li>Establishment of rights upon entry into service</li> </ul>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
	<ul style="list-style-type: none"> <li>Access control systems</li> </ul>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> <li>Video surveillance</li> </ul>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

### C. Conclusions

		Date	Signature
27.	<b>Business owner</b> Nadège Perrine Head of HR Unit  <b>Conclusion</b> No further action required The risk of processing personal data related to staff rights as highlighted in this record is low, because the management of these data is restricted to the HR Officers in charge and to the Commission services, who are all bound by strict confidentiality rules. In addition, these data are safely stored.		
	<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		

