

COVID-19 RESPONSE

Key information

Controller and business owner

Cesare Onestini, Director of the ETF, Cesare.Onestini@etf.europa.eu

Data protection officer

Tiziana Ciccarone / Laurens Rijken, DataProtectionOfficer@etf.europa.eu

Purpose of the processing

The purpose of processing is to manage the ETF response to Covid-19 pandemic, in particular:

- *Managing access to ETF offices (self-declaration and temperature control)*
- *Monitoring presence in ETF office (registration of arrivals-departures)*
- *Handling positive Covid-19 cases and related contact tracing*
- *Managing teleworking (teleworking location)*
- *Identifying vulnerable staff for priority access to vaccine (medical file)*

Legal basis

The legal basis for the processing operations of personal data is:

- *Circular note of the Ministry of Health 22 January 2020, n. 1997 and successive*
- *Ordinance from the Minister of Health 30 January 2020*
- *Resolution of the Council of Ministers 31 January 2020 and successive*
- *Italian Law Decree 23 February 2020, n. 6 and successive*
- *Italian Prime Ministerial Decree 1 March 2020, and successive*
- *Law 5 March 2020, n. 13 and successive*
- *ETF/20/DEC/005 Director decision of 10-06-2020 on ETF COVID-19 anti- infection security protocol - phase 1, and successive*
- *ETF/20/DEC/004 Director decision of 05-06-2020 on Transitional measures for teleworking and leave during the pandemic of Covid-19 disease, and successive*

Personal data

Personal data concerned are:

- For ETF staff (Temporary, Contract and Local Agents) and household members, temporary workers, on-site contractors: *Name, Covid-19 symptoms status in self-declaration, Arrival and departure times (manual register)*
- For ETF staff only: *Location of teleworkers (also if different from place of establishment), Medical file*
- For ETF staff and household members: *Covid-19 infection status when infected.*

Provision of data is obligatory, in particular to be allowed access to ETF premises, and on a general level, to ensure compliance with national Covid-19 related legislation, and for ETF staff, to be compliant with the ETF Covid-19 security anti-infection protocol.

Recipients of the personal data

For the purpose detailed above, access to personal data is provided to the following processing entities:

ETF

- *The ETF Crisis Management Team*
- *HR officers*

Externals (processors)

- *ETHOS surveillance guards (limited to temperature checks and access register)*
- *ETF Medical advisor (limited to ETF staff Covid-19 infection status for return to the office, and medical file in relation to vaccination priority)*
- *Italian health service (Servizi di Igiene e Sanità Pubblica - SISP)*

Transfer to third countries/international organisations

Not applicable

Further information

Data retention

Data collected will be retained for 6 months after the end of Covid-19 pandemic for ETF staff personal data processed in relation to Covid-19 measures, and for 2 weeks after a Covid-19 case for contact tracing data.

Right of access, rectification or erasure, restriction, objection

Any request to access, rectify or erase personal data, or to restrict or object to the processing of personal data shall be addressed in writing to the Director of the ETF, Cesare.Onestini@etf.europa.eu, giving details of the request.

Right to lodge complaint

Data subjects can at any time lodge a complaint on the processing of their personal data to the ETF Data Protection Officer (DataProtectionOfficer@etf.europa.eu) or to the European Data Protection Supervisor (<http://www.edps.europa.eu>).