

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](mailto>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 (Verification of EU Digital Covid certificate/certificate of exemption of vaccination, temperature control, collection of self-declarations)*
- *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/21/DEC/006 Director decision of 26/02/2021 on Transitional measures during the Covid-19 disease pandemic, and successive*
- *Circular notes of the Ministry of Health 5309-04/08/2021-DGPRA and 35444-05/08/2021-DGPRA on the issuing of certificate of exemption of Covid vaccination and successive*
- *Italian Law decree nr 127 of 21 September 2021 on the obligation of EU Digital COVID Certificate for accessing public and private workplaces and successive*

- *ETF/21/DEC/015 Director decision of 12/10/2021 on ETF COVID-19 anti-infection security protocol - phase 1, and successive*

Personal data

Personal data concerned are:

- For ETF staff (Temporary, Contract and Local Agents) and household members, temporary workers, on-site contractors, visitors: *Name and birthdate (visible on VerificaC19 app), body temperature, absence of Covid-19 symptoms in self-declaration, arrival and departure times*
- For ETF staff only: *Location of teleworkers (also if different from place of establishment), certificate of vulnerability for priority access to vaccine*
- For ETF staff and household members: *Covid-19 infection status when infected.*

Provision of data is necessary, 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 anti-infection security protocol.

Concerning the verification of EU Digital Covid certificate: this is done using the VerificaC19 app (as recommended by the Italian Data Protection Authority), installed on a dedicated ETF telephone, used only by designated access control operators. The outcome of the verification is not recorded.

Concerning the verification of certificate of exemption of vaccination, the verification is done by designated access control operators. The outcome of the verification is not recorded.

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 EU digital Covid 19 certificate check, 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 different periods based on the use that is made of the data:

No retention

- Outcome of verification of EU Digital Covid certificate/certificate of exemption of vaccination (staff and externals)
- Outcome of verification temperature control (staff and externals)

2 weeks (for contact tracing)

- Positive Covid cases (staff and household members)

6 months after end of Covid-19 pandemic (for authorities in case of need)

- Self-declarations (staff and externals)
- Arrival and departure times in manual register (staff)

3 years (in HR management system Allegro)

- Location of teleworkers if different from place of establishment (staff)

30 years after termination of service (in medical file)

- Covid-19 end of infection/fit to work (staff)
- Certificate of vulnerability for priority access to vaccine (staff)

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](mailto>DataProtectionOfficer@etf.europa.eu)) or to the European Data Protection Supervisor (<http://www.edps.europa.eu>).