

## I. RECORD OF PERSONAL DATA PROCESSING OPERATION (Art. 31)

1.	Name of the processing operation	<b>Covid-19 response</b>
2.	Reference number/Issue	ETF-DPR-47/Issue 2
3.	Date	07/10/2021
4.	Business owner	Cesare Onestini Director Cesare.Onestini@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)	ETF Medical Advisor ETHOS - Surveillance guards Italian health service (Servizi di Igiene e Sanità Pubblica - SISP)
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu

9.	Purpose of the processing	Collecting and processing personal data necessary to manage response to Covid-19 pandemic, in particular: <ul style="list-style-type: none"> <li>Managing access to ETF offices (Verification of EU Digital Covid certificate/certificate of exemption of vaccination, temperature control, collection of self-declarations)</li> <li>Monitoring presence in ETF office (registration of arrivals-departures)</li> <li>Handling positive Covid-19 cases and related contact tracing</li> <li>Managing teleworking (teleworking location)</li> <li>Identifying vulnerable staff for priority access to vaccine</li> </ul>
10.	Legal basis for the processing	<ul style="list-style-type: none"> <li>EUDPR 2018/1725 Article 10, 2 (h) "occupational medicine" and (i) "public health, such as protecting against serious cross-border threats to health"</li> <li>Circular note of the Ministry of Health 22 January 2020, n. 1997 and successive</li> <li>Ordinance from the Minister of Health 30 January 2020</li> <li>Resolution of the Council of Ministers 31 January 2020 and successive</li> <li>Italian Law Decree 23 February 2020, n. 6 and successive</li> <li>Italian Prime Ministerial Decree 1 March 2020, and successive</li> <li>Law 5 March 2020, n. 13 and successive</li> <li>ETF/21/DEC/006 Director decision of 26/02/2021 on Transitional measures during the Covid-19 disease pandemic, and successive</li> <li>Circular notes of the Ministry of Health 5309-04/08/2021-DGPRES and 35444-05/08/2021-DGPRES on the issuing of certificate of exemption of Covid vaccination and successive</li> <li>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</li> <li>ETF/21/DEC/015 Director decision of ...-10-2021<sup>1</sup> on ETF COVID-</li> </ul>

<sup>1</sup> Decision currently in workflow

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		19 anti- infection security protocol - phase 1, and successive
11.	Categories of data subjects	<ul style="list-style-type: none"> <li>ETF staff (Temporary, Contract and Local Agents) and household members, temporary workers, on-site contractors, visitors</li> </ul>
12.	Categories of personal data	<ul style="list-style-type: none"> <li>All: Name and birthdate (visible on VerificaC19 app), body temperature, absence of Covid-19 symptoms in self-declaration, arrival and departure times</li> <li>ETF staff only: Location of teleworkers (also if different from place of establishment), certificate of vulnerability for priority access to vaccine</li> <li>ETF staff and household members: Covid-19 infection status when infected</li> </ul>
13.	Time limits for keeping of data	<p>No retention</p> <ul style="list-style-type: none"> <li>Outcome of verification of EU Digital Covid certificate/certificate of exemption of vaccination (staff and externals)</li> <li>Outcome of verification temperature control (staff and externals)</li> </ul> <p>2 weeks</p> <ul style="list-style-type: none"> <li>Positive Covid cases (staff and household members)</li> </ul> <p>6 months after end of Covid-19 pandemic</p> <ul style="list-style-type: none"> <li>Self-declarations (staff and externals)</li> <li>Arrival and departure times in manual register (staff)</li> </ul> <p>3 years (in HR management system Allegro, see relevant record 32)</p> <ul style="list-style-type: none"> <li>Location of teleworkers if different from place of establishment (staff)</li> </ul> <p>30 years after termination of service (in medical file, see relevant record 36)</p> <ul style="list-style-type: none"> <li>Covid-19 end of infection/fit to work (staff)</li> <li>Certificate of vulnerability for priority access to vaccine (staff)</li> </ul>
14.	Categories of ETF recipients of data	Crisis Management Team HR officers
15.	Categories of external recipients of data	ETHOS surveillance guards (limited to temperature checks and access register) ETF Medical Advisor Italian health service (Servizi di Igiene e Sanità Pubblica - SISP)
16.	Transfers of data to third country or international organisation	Not applicable
17.	Technical and organisational security measures	<ul style="list-style-type: none"> <li>Self-declarations received via email are kept in (functional) email with sole access by persons with “need-to-know” using unique username-password</li> <li>Paper self-declarations stored in secure and locked place and accessible only to security guard</li> <li>Daily paper register of arrival-departure times is stored in secure and locked place and accessible only to security guard</li> <li>Positive Covid-19 cases register saved on secure network with password protected access</li> <li>Medical files stored in secure and locked place and only accessible to ETF Medical Advisor (see also record 36 Management of medical files)</li> <li>Verification of EU Digital COVID Certificate is done by designated access control operators 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</li> </ul>

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		<p>recorded</p> <ul style="list-style-type: none"> <li>• Verification of certificates of exemption of vaccination is done by designated access control operators. The outcome of the verification is not recorded</li> </ul>
18.	Information to the data subject	Provided in privacy statement, and available at entrance of ETF building (in simplified form)

## II. COMPLIANCE CHECK AND RISK SCREENING OF PERSONAL DATA PROCESSING OPERATION (Art. 26 and 39)

Name of the processing operation	<b>Covid-19 response</b>
Reference number	ETF-DPR-47/Issue 2
Date	07/10/2021

### A. Compliance check

19.	<p><b>Lawfulness</b> (Legal basis and necessity for processing, point 10)</p> <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 checked="" type="checkbox"/> Necessary in order to protect the vital interests of the data subject or of another natural person</li> </ul>	Details (if needed):
20.	<p><b>Purpose definition</b> (Point 9)</p> <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.	<p><b>Data minimisation</b> (Point 12)</p> <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.	<p><b>Accuracy</b> (Point 12)</p> <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>• Information provided on self-declaration cannot be further checked. In case a staff member or contractor realises he provided incorrect information he can provide a new self-declaration. The EU Digital COVID Certificate is scanned using the VerificaC19 app, which verifies the digital signatures, and is updated daily with list of invalidated certificates (due to Covid infection), and shows the name of the holder (to avoid somebody using the QR code of another person)</li> <li>• Staff are welcome at any time to correct inaccurate information provided by meeting the ETF Medical Advisor</li> </ul>
23.	<p><b>Storage limitation</b> (Point 13)</p> <ul style="list-style-type: none"> <li>• Explain why you chose the storage period(s) mentioned</li> </ul>	<ul style="list-style-type: none"> <li>• The period of 2 weeks concerns data necessary for contact tracing, with 2 weeks being approximate maximum duration of a</li> </ul>

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	<ul style="list-style-type: none"> <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>	<p>tracing exercise, the period of 6 months after end of pandemic concerns data which may be requested to support authorities in case of need, the period of 3 years for teleworking location is standard retention for absences, the period of 30 years after termination of contract is standard period for data in medical file</p> <ul style="list-style-type: none"> <li>As short as possible</li> <li>Not applicable</li> </ul>
24.	<p><b>Transparency</b> (Point 18)</p> <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>Privacy statement is available through Intranet, its location is indicated on self-declaration forms, and available at entrance of ETF</li> <li>Not applicable</li> </ul>
25.	<p><b>Data subjects’ rights</b> (Point 18)</p> <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>Yes, through question to the business owner (Director)</li> <li>Not applicable</li> </ul>

B. Risk screening

26.	<p><b>Does the processing involve any of the following?</b></p> <ul style="list-style-type: none"> <li>Data relating to health, (suspected) criminal offences or otherwise considered sensitive <input checked="" type="checkbox"/> Yes <input 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> </ul>
	<ul style="list-style-type: none"> <li>Exclusion databases <input checked="" type="checkbox"/> Yes <input 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>E-recruitment tools automatically pre-selecting/excluding candidates without human intervention <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> </ul>
	<ul style="list-style-type: none"> <li>Management of personal files <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>Staff evaluation procedures (annual appraisal) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>360° evaluations for helping staff members develop training plans <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>Management of leave, flexitime and telework <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</li> <li>Access control systems (non biometric) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</li> <li>Video surveillance (limited scale) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> </ul>

C. Conclusions

	Actor	Date	Signature
27.	<p><b>Data Protection Officer:</b> Tiziana Ciccarone / Laurens Rijken</p> <p><b>Conclusion</b> I confirm that no further action is required</p>	5-10-2021	Email approval
	<p><b>Business Owner - Data Controller</b> Cesare Onestini, Director of the ETF</p>	7-10-2021	Email approval