

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

1.	Name of the processing operation	<b>Transmission of health data in the framework of Covid-19 vaccination campaign</b>
2.	Reference number/Issue	ETF-DPR-49/Issue 3
3.	Date	12/10/2021
4.	Business owner	Cécile Beelaerts Head of Resources unit, Strategy and Resources department Cecile.Beelaerts@etf.europa.eu
5.	Controller	Cesare Onestini Director of the ETF Cesare.Onestini@etf.europa.eu
6.	Joint controller(s)	Italian Ministry of Foreign Affairs and International Cooperation (Ministero degli Affari Esteri e della Cooperazione Internazionale, MAECI) European Commission - Representation office in Rome (Italy) and relevant Italian authorities
7.	Processor(s)	ETF Medical Advisor, ETF General Practitioner Italian National Health Service Italian Ministry of Health
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu

9.	Purpose of the processing	The purpose of the processing is the transmission to the Italian health authorities of personal data of ETF staff, ETF pensioners and their family members (spouses and children) not enrolled in the Italian Health System, who want to be included in the Italian vaccination campaign against COVID-19, third dose vaccination and booster dose.
10.	Legal basis for the processing	The processing occurs in compliance with EUDPR 2018/1725 Article 10, 2 (h) "occupational medicine" and (i) "public health, such as protecting against serious cross-border threats to health"  The legal base for the transfer of personal data is consent
11.	Categories of data subjects	ETF staff (Temporary, Contract and Local Agents), ETF pensioners and family members (spouses and children)
12.	Categories of personal data	<ul style="list-style-type: none"> <li>•Mandatory: Name, date of birth, sex, ID card/passport/driving licence number (other document useful to that purpose), place of birth, information on seat of work, end date of presence on the Italian territory</li> <li>•If available: Italian fiscal code, foreign state of residence, telephone and email. Vulnerability category (1 or 4)</li> <li>•Mandatory for being included in the list for 3<sup>rd</sup> doses or booster doses: relevant medical documents.</li> </ul>
13.	Time limits for keeping of data	The personal data of staff members, including the consent to the transfer, will be added to the staff member medical file, and retained in accordance with the period set for the medical file. The personal data of family members, including consent to the transfer, will be deleted after the conclusion of the vaccination campaign. The dedicated mailbox for receiving the data and consent from staff members and family members will be deleted after the conclusion of the vaccination campaign.
14.	Categories of ETF recipients of data	HR officers in charge of health and communication with Italian relevant authorities and Directorate's officer

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15.	Categories of external recipients of data	Italian Ministry of Foreign Affairs and International Cooperation (Ministero degli Affari Esteri e della Cooperazione Internazionale, MAECI) and European Commission - Representation office in Rome (Italy) relevant Italian authorities, Covid Call Center – Regione Piemonte ETF Medical Advisor, ETF General Practitioner Italian National Health Service Italian Ministry of Health
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>• Use of a dedicated mailbox for receiving the data and consent from staff members with limited access to the HR officers in charge of the campaign</li> <li>• HR officers and Directorate’s officer sign specific declaration of secrecy</li> <li>• Medical files stored in secure and locked place and only accessible to ETF Medical Advisor and General Practitioner (see also record 36 Management of medical files)</li> </ul>
18.	Information to the data subject	Provided in privacy statement

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

Name of the processing operation	<b>Transmission of health data in the framework of Covid-19 vaccination campaign</b>
Reference number	ETF-DPR-49/Issue 3
Date	12/10/2021

### A. Compliance check

19.	<p><b>Lawfulness</b> (Legal basis and necessity for processing, point 10)</p> <p><input type="checkbox"/> Necessary for performance of tasks in the public interest attributed by EU or MS legislation</p> <p><input checked="" type="checkbox"/> Necessary for the management and functioning of the organisation</p> <p><input checked="" type="checkbox"/> Necessary for compliance with legal obligation incumbent on controller</p> <p><input type="checkbox"/> Necessary for performance of a contract to which the data subject is party</p> <p><input checked="" type="checkbox"/> The data subject has given consent</p> <p><input checked="" type="checkbox"/> Necessary in order to protect the vital interests of the data subject or of another natural person</p>	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 by staff member cannot be further checked. In case a staff member realises he provided incorrect information he can ask for correction</li> <li>Staff have the right 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> <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>Data in the medical file of staff members: see record 36 on medical file. Data linked to the composition of groups of vulnerable staff and family members, the personal data of family members, including consent form, and the dedicated mailbox for receiving the data and consent from staff and family members will be removed after the conclusion of the vaccination</li> </ul>

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		<p>campaign.</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 will be included in the email asking for staff personal data /consent and is available through ETF Intranet</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 or to the responsible HR staff officers</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 type="checkbox"/> Yes <input checked="" 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>Access control systems (non biometric) <input type="checkbox"/> Yes <input checked="" 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>Business owner</b> Cécile Beelaerts Head of Resources unit, Strategy and Resources department <b>Conclusion</b> No further action required</p>	14-10-2021	Email validation
	<p><b>Data Protection Officer:</b> Tiziana Ciccarone / Laurens Rijken <b>Conclusion</b> I confirm that no further action is required</p>	14-10-2021	Email validation
	<p><b>Data Controller</b> Cesare Onestini, Director of the ETF</p>	14-10-2021	Email validation

