

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

| | | |
|-----|--|---|
| 1. | Name of the processing operation | ARES Records management system |
| 2. | Reference number/Issue | ETF-DPR-69/Issue 1 |
| 3. | Date | 01/03/2023 |
| 4. | Business owner | Thierry Foubert Head of Strategic development unit Thierry.Foubert@etf.europa.eu |
| 5. | Controller | Xavier Matheu de Cortada Director ad-interim of the ETF Director@etf.europa.eu |
| 6. | Joint controller(s) | Not applicable |
| 7. | Processor(s) | European Commission Directorate-General DIGIT DIGIT-ARES-SUPPORT@ec.europa.eu |
| 8. | Data protection officer | Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu |
| 9. | Purpose of the processing | Allow the management of official records and documents created, received and sent by ETF staff, in order to preserve its corporate memory, to account for its activities, and to allow for transparency towards citizens. |
| 10. | Legal basis for the processing | <ul style="list-style-type: none"> Director's decision ETF/23/DEC/003 on ETF Records management policy |
| 11. | Categories of data subjects | ETF staff members, and any person who sends to, or receives from the ETF a formal document which is registered in the system |
| 12. | Categories of personal data | <ul style="list-style-type: none"> Staff member: name, respective department/unit in ETF Externals: name, country, email (optional physical address) Any personal data that may be in the content of registered records (documents) |
| 13. | Time limits for keeping of data | <ul style="list-style-type: none"> All records in ARES are filed in files that are linked to a category of ETF's specific retention list, which is available on ETF intranet. The retention period starts counting from the latest registered record once a file is closed. |
| 14. | Categories of ETF recipients of data | ETF staff. Access to sensitive files and the records contained in these files are restricted to specific groups of persons. In addition, specific records when entered in the system can receive additional specific markings restricting access to those document |
| 15. | Categories of external recipients of data | Not applicable |
| 16. | Transfers of data to third country or international organisation | Not applicable |
| 17. | Technical and organisational security | DG DIGIT manages the system security and safety. Access to the Agency's registered records and files (including personal data) is protected by |

RECORD OF PERSONAL DATA PROCESSING OPERATION - ARES Records management system

| | | |
|-----|---------------------------------|---|
| | measures | means of a login and access rights in accordance with the 'need to know' principle and are based on the duties entrusted to access holders. The usernames and passwords are managed by the European Commission's common authentication service EU Login (formerly known as ECAS). |
| 18. | Information to the data subject | Provided in privacy statement |

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 | ARES Records management system |
| Reference number | ETF-DPR-69/Issue 1 |
| Date | 01/03/2023 |

A. Compliance check

| | | |
|-----|---|---|
| 19. | <p>Lawfulness (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 type="checkbox"/> The data subject has given consent</p> <p><input type="checkbox"/> Necessary in order to protect the vital interests of the data subject or of another natural person</p> | |
| 20. | <p>Purpose definition (Point 9)</p> <ul style="list-style-type: none"> Do you list all purposes? Are the purposes specified, explicit, legitimate? Where information is also processed for other purposes, are you sure that these are not incompatible with the initial purpose(s)? | <ul style="list-style-type: none"> Yes Yes Yes |
| 21. | <p>Data minimisation (Point 12)</p> <ul style="list-style-type: none"> Do you really need all data items you plan to collect? Are there any you could do without? | <ul style="list-style-type: none"> Yes No |
| 22. | <p>Accuracy (Point 12)</p> <ul style="list-style-type: none"> How do you ensure that the information you process about people is accurate? How do you rectify inaccurate information? | <ul style="list-style-type: none"> Staff member data originates from Sysper and ComRef, as inserted by ETF HR team. Externals data originate from the staff member registering the created or received record. As the presence of inaccurate information is signalled a check is put in place and, as applicable, relevant rectification is made. |
| 23. | <p>Storage limitation (Point 13)</p> <ul style="list-style-type: none"> Explain why you chose the storage period(s) mentioned Are they limited according to the maximum or | <ul style="list-style-type: none"> The different storage periods have been established based on ETF/Commission retention scheme and EDPS guidance As short as possible |

COMPLIANCE CHECK AND RISK SCREENING - ARES Records management system

| | | |
|-----|--|---|
| | <p>minimum “as long as necessary, as short as possible”?</p> <ul style="list-style-type: none"> In case you only need some information for longer, can you split storage periods? | <ul style="list-style-type: none"> Yes (see details in point 13) |
| 24. | <p>Transparency (Point 18)</p> <ul style="list-style-type: none"> How do you tell people about your processing? If you do not want to inform people (or only inform them after the fact), consult your DPO | <ul style="list-style-type: none"> Information is given to the data subject via a privacy statement accessible from the system. The privacy statement is also directly accessible on ETF website (for external persons) Not applicable |
| 25. | <p>Data subjects rights (Point 18)</p> <ul style="list-style-type: none"> 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? Could there be situations where you would want to refuse e.g. granting access? In case so please describe them | <ul style="list-style-type: none"> The data subject can request information on or access to his/her data at any time to the ETF Document Management Officer. Requests of rectification or deletion of data will be checked and accepted only if compliant with the regulatory framework. Not applicable |

B. Risk screening

| | |
|-----|---|
| 26. | <p>Does the processing involve any of the following?</p> <ul style="list-style-type: none"> Data relating to health, (suspected) criminal offences or otherwise considered sensitive <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Evaluation, automated decision- making or profiling <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Monitoring data subjects <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No New technologies that may be considered intrusive <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | <ul style="list-style-type: none"> Exclusion databases <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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 Internet traffic analysis breaking encryption <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E-recruitment tools automatically pre-selecting/excluding candidates without human intervention <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | <ul style="list-style-type: none"> Management of personal files <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Staff evaluation procedures (annual appraisal) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 360° evaluations for helping staff members develop training plans <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Staff selection procedures <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Establishment of rights upon entry into service <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Management of leave, flexitime and telework <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Access control systems (non biometric) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Video surveillance (limited scale) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

C. Conclusions

| | Actor | Date | Signature |
|-----|---|------|-----------|
| 27. | <p>Business owner Thierry Foubert Head of Strategic development unit Conclusion Threshold assessment required according to Risk screening</p> | | |
| | <p>Data Protection Officer: Laurens Rijken Conclusion I confirm that no further action is required</p> | | |

