



European Research Council
Executive Agency

Established by the European Commission

RECORD OF PERSONAL DATA PROCESSING

Art. 31 of the REGULATION (EU) 2018/1725 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (henceforth the "Data protection regulation")

Record n°

DPO 16 - 2020

In accordance with Article 31 of the data protection regulation, individuals whose personal data are processed by the Executive Agency in any context whatsoever are to be protected with regard to the processing of personal data and the Executive Agency has to keep records of their processing operations.

This record covers two aspects:

- 1. Mandatory records under Art 31 of the data protection regulation (recommendation: make the header and part 1 publicly available)*
- 2. Compliance check and risk screening (initial; part 2 is internal only to the Agency, not published)*

The ground for the record is (tick the relevant one):

- Regularization of a data processing operation already carried out*
- Record of a new data processing operation prior to its implementation*
- Change of a data processing operation.*

Managing the obligatory records of meeting participants in the context of COVID-19

1	Last update of this record if applicable	
2	Short description of the processing	<p>The central services (Secretariat General) have asked the ERCEA to keep track of all the participants in meetings in order to be able to trace individuals under risk of contamination.</p> <p>Personal data are collected by meeting organisers through the template "overview of participation in meetings".</p> <p>The personal data collected through these templates are then consolidated in Excel sheets according to the format provided by the Secretariat General, and sent to the member in the Business Continuity Team in charge of submitting the data to the Secretariat General.</p>

Part 1 - Article 31 Record

3	Function and contact details of the controller	ERCEA Director ERC-BCP@ec.europa.eu
4	Contact details of the Data Protection Officer (DPO)	ERC-DATA-PROTECTION@ec.europa.eu
5	Name and contact details of joint controller (where applicable)	European Commission – Directorate-General for Human Resources and Security (HR) - HR-DATA-PROTECTION-COORDINATOR@ec.europa.eu European Commission – Directorate-General for Interpretation (SCIC) - scic-data-protection-coordinator@ec.europa.eu
6	Name and contact details of processor (where applicable)	
7	Purpose of the processing	The purposes of this processing operation are to record and identify participants for all meetings organised by the ERCEA to ensure a swift route of communication with the colleagues in case it becomes necessary for health reasons in view of the ongoing COVID-19 situation. This applies to internal meetings, meetings with external participants, stakeholders' meetings, conferences, etc. on ERCEA or Commission premises as well as on external venues. The aim is to centrally register participants to meetings, to identify them in case an infection among meeting participants occurs so as to take all necessary measures to protect the health of staff.
8	Description of the categories of data subjects	Whose personal data are being processed? <input checked="" type="checkbox"/> EA staff (Contractual and temporary staff in active position) <input checked="" type="checkbox"/> Visitors to the EA <input checked="" type="checkbox"/> Contractors providing goods or services <input checked="" type="checkbox"/> Applicants <input type="checkbox"/> Relatives of the data subject <input type="checkbox"/> Complainants, correspondents and enquirers <input type="checkbox"/> Witnesses <input type="checkbox"/> Beneficiaries <input checked="" type="checkbox"/> External experts <input checked="" type="checkbox"/> Contractors <input checked="" type="checkbox"/> Other, please specify: trainees and interim workers,

		<p>intra-muros.</p> <p>All participants in meetings including internal Commission meetings, meetings with external participants or stakeholders, as well as larger conferences and events taking place on the Commission premises and in external venues.</p>
<p>9</p>	<p>Description of personal data categories</p> <p>Indicate all the categories of personal data processed and specify which personal data are being processed for each category (between brackets under/next to each category):</p>	<p><i>Categories of personal data:</i></p> <p><input type="checkbox"/> in the form of personal identification numbers</p> <p><input type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints</p> <p><input type="checkbox"/> concerning the data subject's private sphere</p> <p><input type="checkbox"/> concerning pay, allowances and bank accounts</p> <p><input type="checkbox"/> concerning recruitment and contracts</p> <p><input type="checkbox"/> concerning the data subject's family</p> <p><input type="checkbox"/> concerning the data subject's career</p> <p><input type="checkbox"/> concerning leave and absences</p> <p><input type="checkbox"/> concerning missions and journeys</p> <p><input type="checkbox"/> concerning social security and pensions</p> <p><input type="checkbox"/> concerning expenses and medical benefits</p> <p><input checked="" type="checkbox"/> concerning telephone numbers and communications</p> <p>[Professional or personal phone number and professional or personal e-mail address]</p> <p><input checked="" type="checkbox"/> concerning names and addresses (including email addresses)</p> <p>[First name and surname]</p> <p><input type="checkbox"/> Other :please specify :_____</p> <p><i>Categories of personal data processing likely to present <u>specific risks</u>:</i></p> <p><input type="checkbox"/> data relating to suspected offences, offences, criminal convictions or security measures</p> <p><input type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct)</p> <p><i>Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10 new Regulation):</i></p> <p><input type="checkbox"/> revealing racial or ethnic origin</p> <p><input type="checkbox"/> revealing political opinions</p> <p><input type="checkbox"/> revealing religious or philosophical beliefs</p>

10	Retention time (time limit for keeping the personal data)	<input type="checkbox"/> revealing trade-union membership <input type="checkbox"/> concerning health <input type="checkbox"/> genetic data, biometric data for the purpose of uniquely identifying a natural person <input type="checkbox"/> concerning sex life or sexual orientation <p><i>Specify any additional data or explanatory information on the data being processed, if any:</i></p> <p>Your personal data will be kept for a maximum period of two months from the date of the meeting as declared in the registry. Personal data will be deleted at the end of this period.</p> <p>Is any further processing for archiving purposes in the public interest, historical, statistical or scientific purposes envisaged? <input type="checkbox"/> yes <input checked="" type="checkbox"/> no</p>
11	Recipients of the data	<p>The persons with access to your personal data, on a need-to-know basis, are:</p> <ul style="list-style-type: none"> • ERCEA Director, Unit Secretariats, Heads of Unit, the Business Continuity Team, meeting organisers, authorised personnel dealing with the obligatory records of meeting participants. • Authorised staff of the Commission services (i.e. SG, DG HR, SCIC) and bodies in charge of the monitoring or inspection tasks in application of EU law (e.g. internal audits, Court of Auditors, European Anti-fraud Office (OLAF)).
12	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	N/A
13	<u>General</u> description of the technical and organisational security measures	<p>Physical security</p> <ul style="list-style-type: none"> • Paper files are stored in Unit Assistants' locked cupboards that are accessible to authorised staff members only. • Access to the DIGIT datacentre is restricted to DIGIT authorized staff; it is controlled by badge and pin code. • Access to the two server rooms is restricted to the LSA team and the HoU D.1, controlled by badge and pin code.

		<p>IT security</p> <ul style="list-style-type: none"> • Outlook: the user needs to log onto the Windows Environment or onto the Outlook WebApp (available via https://myremote.ec.europa.eu and protected via a two-way authentication methodology) to have access to his/her email account. In addition, it is recommended to all the internal stakeholders involved in this processing to exclusively use the encrypted (S/MIME aka SECEM) security system. • Access to the BCP functional mailbox is restricted to authorised members of the ERCEA staff. • Access to the central database is restricted to authorised personnel dealing with the obligatory records of meeting participants.
14	<p>Information to data subjects/Data Protection Notice (DPN)</p>	<p>A Data Protection Notice has been prepared and is available on the intranet page of the Agency dedicated to Coronavirus:</p> <p>http://intranet.ercea.cec.eu.int/Pages/Information-to-staff-on-Coronavirus.aspx</p>