



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 21/2020

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 presence in the context of COVID-19

1	Last update of this record if applicable	N/A
2	Short description of the processing	<p>In the context of the actions for preventing the COVID-19 spread and in order to be able to proceed with the gradual deconfinement in accordance with the conditions set up by the Commission and the ERCEA, the Agency considers important to keep track of all the presences of its staff in the Covent Garden building in order to be able to trace individuals under risk of contamination.</p> <p>Personal data are collected directly from staff through the online tool for records of presence available in SharePoint and is consolidated in Excel sheets for further analysis. In this context, the ERCEA could also use the online tool to monitor that the measures established by the Agency, aimed at protecting the staff from the COVID-19, for</p>

working from the ERCEA premises are respected.

## Part 1 - Article 31 Record

3	<b>Function and contact details of the controller</b>	ERCEA Director <a href="mailto:ERC-BCP@ec.europa.eu">ERC-BCP@ec.europa.eu</a>
4	<b>Contact details of the Data Protection Officer (DPO)</b>	<a href="mailto:ERC-DATA-PROTECTION@ec.europa.eu">ERC-DATA-PROTECTION@ec.europa.eu</a>
5	<b>Name and contact details of joint controller (where applicable)</b>	N/A
6	<b>Name and contact details of processor (where applicable)</b>	Directorate-General for Informatics (DG DIGIT) <a href="mailto:DIGIT-DATA-PROTECTION-COORDINATOR@ec.europa.eu">DIGIT-DATA-PROTECTION-COORDINATOR@ec.europa.eu</a>
7	<b>Purpose of the processing</b>	<p>The overall purpose of this processing operation is to record and identify presences of the ERCEA staff 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 all colleagues working from the ERCEA or Commission premises or accessing the building exceptionally for short periods of time.</p> <p>The aim is to centrally register building presence, to identify staff in case an infection occurs and to check that the conditions set up by the Agency for working from the ERCEA premises are respected.</p> <p>For instance, the shift system is part of the return to the office policy of the European Commission and of the ERCEA, which is used to significantly reduce the risk of infections within the office premises during the COVID-19 pandemic. This operation allows the Agency to better assess and improve the application of all the measures necessary taken to protect the health of staff in view of the ongoing COVID-19 situation.</p> <p>Moreover, the Data Controller may envisage anonymous statistical analyses with the purpose of improving the quality of the process.</p>
8	<b>Description of the categories of data subjects</b>	Whose personal data are being processed? <input checked="" type="checkbox"/> <b>EA staff</b> [Contract and temporary staff]. <input type="checkbox"/> Visitors to the EA

		<input checked="" type="checkbox"/> <b>Contractors providing goods or services including</b> [Interim staff and intra-muros experts]. <input 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"/> <b>External experts</b> [Seconded National Experts]. <input checked="" type="checkbox"/> <b>Other</b> [Blue Book Trainees].
9	<b>Description of personal data categories</b>  Indicate <b>all</b> the categories of personal data processed and specify which personal data are being processed for each category (between brackets under/next to each category):	<i>Categories of personal data:</i> <input type="checkbox"/> in the form of personal identification numbers <input type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints <input type="checkbox"/> concerning the data subject's private sphere <input type="checkbox"/> concerning pay, allowances and bank accounts <input checked="" type="checkbox"/> <b>concerning recruitment and contracts</b> [Organisation (Sector, Unit, Department)]. <input type="checkbox"/> concerning the data subject's family <input type="checkbox"/> concerning the data subject's career <input type="checkbox"/> concerning leave and absences <input type="checkbox"/> concerning missions and journeys <input type="checkbox"/> concerning social security and pensions <input type="checkbox"/> concerning expenses and medical benefits <input type="checkbox"/> concerning telephone numbers and communications <input checked="" type="checkbox"/> <b>concerning names and addresses (including email addresses)</b> [First name and surname, office number(s)]. <input checked="" type="checkbox"/> <b>Other:</b> [Data relating to presence: date and work type (morning, afternoon, all day)] [Date of entry and, if applicable, modification]

10	Retention time (time limit for keeping the personal data)	<p><i>Categories of personal data processing likely to present specific risks:</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 prohibited, 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> <p><input type="checkbox"/> revealing trade-union membership</p> <p><input type="checkbox"/> concerning health</p> <p><input type="checkbox"/> genetic data, biometric data for the purpose of uniquely identifying a natural person</p> <p><input type="checkbox"/> concerning sex life or sexual orientation</p> <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 one month from the date of the presence as declared in the tool. 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 checked="" type="checkbox"/> yes <input type="checkbox"/> no</p> <p>The Controller or the ERCEA in general may envisage anonymous statistical analyses with the purpose of improving the quality of the processes and the management of human resources.</p>
11	Recipients of the data	<p>The persons with access to your personal data, on a <b>need-to-know basis</b>, are:</p> <ul style="list-style-type: none"> <li>ERCEA Director, the Business Continuity Team and authorised personnel dealing with the records of presence.</li> <li>Authorised staff members in the ERCEA's IT Unit (D.1), the REA's SharePoint administration team, and DG DIGIT in charge of developing, hosting and maintaining the IT system, only for the purpose of running the system.</li> </ul>

12	<p>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</p>	N/A
13	<p><b>General description of the technical and organisational security measures</b></p>	<p><b>Physical security</b></p> <ul style="list-style-type: none"> <li>• Access to the DIGIT datacentre is restricted to DIGIT authorized staff; it is controlled by badge and pin code.</li> <li>• Access to the two server rooms is restricted to the LSA team and the HoU D.1, controlled by badge and pin code.</li> </ul> <p><b>IT security</b></p> <ul style="list-style-type: none"> <li>• SharePoint: the user needs to use ECAS identification.</li> </ul>
14	<p><b>Information to data subjects/Data Protection Notice (DPN)</b></p>	<p>A Data Protection Notice has been prepared and is available on the intranet page of the Agency dedicated to Coronavirus:</p> <p><a href="http://intranet.ercea.cec.eu.int/Pages/Information-to-staff-on-Coronavirus.aspx">http://intranet.ercea.cec.eu.int/Pages/Information-to-staff-on-Coronavirus.aspx</a></p>