



## RECORD OF PERSONAL DATA PROCESSING

Art. 31 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 "Regulation")

Record n°

09/2021

*In accordance with Article 31 of Regulation 2018/1725, individuals whose personal data are processed by the Agency in any context whatsoever are to be protected with regard to the processing of personal data and the Agency has to keep records of their processing operations.*

*This record covers two aspects:*

- 1. Mandatory records under Art 31 of the 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*
- Migration from notification to record.*

<b>COVID-19 – Work condition and health of staff</b>	
<b>1</b>	<b>Last update of this record (where applicable)</b> The last version of this record was from December 2021.
<b>2</b>	<b>Short description of the processing</b> The purpose of this processing operation is to record personal data considered necessary to ensure the working conditions and health of EACEA staff during the COVID-19 pandemic situation. This applies to the follow-up of staff health and safety relating COVID-19 cases.
<b>Part 1 - Article 31 Record</b>	
<b>3</b>	<b>Name of the Controller</b> <b>Unit(s) and/or function of person acting on behalf of the Controller</b> The controller is the European Education and Culture Executive Agency (EACEA). For

	organisational reasons, the role of the data controller is exercised by the head of Unit R1 ("People, Workplace and Communication") of the EACEA. The controller may be contacted via functional mailbox: <a href="mailto:EACEA-TIME-MANAGEMENT@ec.europa.eu">EACEA-TIME-MANAGEMENT@ec.europa.eu</a> .
4	<b>Contact details of the Data Protection Officer (DPO)</b>  EACEA-data-protection@ec.europa.eu
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>  N/A
7	<b>Purpose of the processing</b>  The purpose of this processing operation is to process personal data considered necessary to ensure the working conditions and health of EACEA staff relating COVID-19.  This applies to the identification of staff members affected by the COVID-19 virus in order to be able to do the necessary follow up (contact tracing) and ensure that the office space in which such contact may have occurred is disinfected.
8	<b>Description of the categories of data subjects</b>  Whose personal data are being processed? In case data categories differ between different categories of persons, please explain as well (e.g. suspects vs. witnesses in administrative inquiries)  <input checked="" type="checkbox"/> Agency staff (Contractual and temporary staff in active position) <input type="checkbox"/> Visitors to the Agency <input type="checkbox"/> Contractors providing goods or services <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 type="checkbox"/> External experts <input type="checkbox"/> Contractors <input checked="" type="checkbox"/> Other, please specify: interim and intra-muros
9	<b>Description of personal data categories</b>  <b>Indicate <u>all</u> the categories of personal data processed and specify which personal data are being processed for each category (between brackets under/next to each category):</b>  <i>a) Categories of personal data:</i>  <input type="checkbox"/> in the form of personal identification numbers

	<p> <input type="checkbox"/> concerning the data subject's private sphere  <input type="checkbox"/> concerning pay, allowances and bank accounts  <input type="checkbox"/> concerning recruitment and contracts  <input type="checkbox"/> concerning the data subject's family  <input type="checkbox"/> concerning the data subject's career  <input checked="" 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"/> concerning names and addresses  <input checked="" type="checkbox"/> Other: please specify: <ul style="list-style-type: none"> <li>• list of close contacts with the staff member concerned after appearance of the first symptoms</li> <li>• office presence: regular office number, different office or room (if relevant), approximate work time (date; morning, afternoon, all day)</li> </ul> </p> <p><b><i>b) Categories of personal data processing likely to present <u>specific risks</u>:</i></b></p> <p> <input type="checkbox"/> data relating to suspected offences, offences, criminal convictions or security measures  <input type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct) </p> <p><b><i>c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):</i></b></p> <p> <input type="checkbox"/> revealing racial or ethnic origin  <input type="checkbox"/> revealing political opinions  <input type="checkbox"/> revealing religious or philosophical beliefs  <input type="checkbox"/> revealing trade-union membership  <input checked="" type="checkbox"/> concerning health <ul style="list-style-type: none"> <li>• medical status (possible COVID-19 symptoms, test results if any)</li> </ul> <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> <p><b><i>d) Specify any additional data or explanatory information on the data being processed, if any: -</i></b></p> <p>_____</p> <p>The health data processed is medical symptoms relating to Covid-19 and potential testing results. Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious threats to staff health or ensuring high standards of quality and safety of health care. EACEA will not collect detailed information concerning the health of data subjects but will be informed if a staff member is contaminated/or in contact with a contaminated person in order to take appropriate action towards the other staff members, which may have been entered into contact with him/her (request for quarantine, etc).</p>
10	<p><b>Retention time (time limit for keeping the personal data)</b></p>
	<p><b>Follow-up of staff health and safety during the COVID-19 pandemic:</b> the personal data is kept in the outlook email of the line managers of staff. The emails are deleted after 6 months from all the outlook mailboxes. Information received by Human Resources (HR) in the functional mailbox</p>

	<p><a href="mailto:EACEA-TIME-MANAGEMENT@ec.europa.eu">EACEA-TIME-MANAGEMENT@ec.europa.eu</a> is automatically deleted. All the data collected by the Medical Service of the European Commission is kept by them in the medical file for 30/40 years in accordance with the retention period applicable to these files (see record <a href="#">DPR-EC-01837.2</a>). The COVID-19 contact points in OIB keep the personal data for 5 years.</p> <p><b>Is any further processing for historical, statistical or scientific purposes envisaged?</b>  <input checked="" type="checkbox"/> yes <input type="checkbox"/> no</p>
11	<p><b>Recipients of the data</b></p> <ul style="list-style-type: none"> <li>• European Commission Medical service</li> <li>• Contact point in OIB for the cleaning/sanitation in order to provide necessary sanitation of offices and shared spaces</li> </ul> <p>Only if contacted by the staff member or by the Medical Service:</p> <ul style="list-style-type: none"> <li>• Line managers of staff (Director, Heads of Department, Unit or Sector)</li> <li>• Authorised personnel of Unit R.1 - “Human Resources”</li> </ul>
12	<p><b>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</b></p> <p>NO</p>
13	<p><b>General description of the technical and organisational security measures</b></p> <p>The European Commission’s IT systems used by the Agency abide by the Commission's security guidelines. The Agency must comply with Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.</p> <p>1. Organisational measures:</p> <p>A Corporate Local Informatics Security Officer (C-LISO) is in place. Its role includes supervising the Agency compliance with the relevant regulations, and the application of security measures recommend by DIGIT.</p> <p>Organisational measures include appropriate access rights and access control. As a rule within the Agency, access to information systems, the file system or offices are subject to a series of authorisations where the person granting the access is different from the person requesting or authorising the access - except in limited cases of delegation. The HR responsible person in the unit in charge of this action (processing operation of the current record) collects and places the documents on the secured drives of the Commission and all Agency staff are bound by a confidentiality obligation. The need to know principle applies in all cases.</p> <p>2. Technical measures:</p> <p>State of the art technical cybersecurity measures are implemented in the corporate systems, according to the security needs. Those measures are in constant evolution.</p>
14	<p><b>Information to data subjects / Privacy Statement</b></p> <p>Privacy Statements relevant to these data processing activities are available on the <a href="#">EACEA Intranet</a>.</p>