REGISTER NUMBER: 127

NOTIFICATION FOR PRIOR CHECKING

Date of submission: 25 October 2006

Case number: 2006-506

Institution: EESC and COR

Legal basis: article 27-5 of the regulation CE 45/2001(1)

(1) OJ L 8, 12.01.2001

INFORMATION TO BE GIVEN(2)

(2) Please attach all necessary backup documents

1/ Name and adress of the controller

O'Higgins, Niall, IT Unit, Head of Unit, Belliard 99-101, 1040 Brussels

DELEGATED CONTROLLERS

Morant, Jean-Pierre, Head of Service, IT - User Support Services

2/ Organisational parts of the institution or body entrusted with the processing of personal data

IT Unit (Directorate for Logistics and Translation)

3/ Name of the processing

Name under which the processing is being organised:

USER ACCOUNT MANAGEMENT

Short description of the processing:

User account management for the IT system of the European Economic and Social Committee and the

Committee of the Regions, as described in the working document "User Account Management" (see Annex I)

Creation, Modification and Deletion of User Accounts using an /7Application

Staff Accounts are based on information in the Centurio application

Members Accounts are based on information in the Agora application

All relevant correspondence concerning user account management is kept on file, (e.g. e-mails, notes etc.)

4/ Purpose or purposes of the processing

To enable use of the IT System at the EESC-CoR

5/ Description of the category or categories of data subjects

All Staff, Statutory or not, within the Committees and having a need for using the Committees' IT System.

All Members (including Alternates, Assistants, CCMI Delegates and alternates & their collaborators) and

having a need for using the Committees' IT System

6/ Description of the data or categories of data(including, if applicable, special categories of data (article 10) and/or origin of data)

BASIC DATA NEEDED TO CREATE A USER ACCOUNT: - Name

- Alias (User-name for computer system)
- Committee
- Office number
- Phone number
- Unit
- E-mail address
- Country, Group, Bureau (yin) for Committee Members Expiry Date (e.g. end of contract, end of mandate)

PASSWORDS

The application to create user accounts sets an initial random password. Users have to change it the first time they logon to the network. After that, the IT unit does not know the password of the users. The IT Unit, may on request of the user, reset their password. Users are recommended to change their password every 3 months and at least once a year.

LOGFILES:

Logfiles are used for solving technical problems and for preparing anonymous statistics for trend analysis. The maximum retention time is 6 months.

INTERNET AND E-MAIL LOGFILES:

All access to the internet via Internet Explorer is written to a logfile. This logfile contains the address of the web site visited and the user's identification. The information related to the sender, the recipients, the subject, the date and the time of all the e-mails to/from the internet are stored in a logfile.

For e-mail, all the addresses to which users have sent e-mails and from which they received emails that were not tagged as spam, are stored in a database. These addresses are used for filtering against spam and are kept for an unlimited duration.

"LOGON"

For every logon, the userid, PC-name, date and time is written to a logfile.

"LAST LOGON

A last "logon report" is generated on demand. This information is used to identify unused accounts. Newly created accounts which have not been used after one month are deleted. Accounts which have been unused for 6 months may be suspended or deleted.

HELPDESK APPLICATION

The Helpdesk register information about technical incidents and problems in a database application. This information is used for problem-solving and trend analysis.

7/ Information to be given to data subjects

information on User Account Management is available on the Intranet. This information is mentioned (with indication of the location):

In the documentation provided to all new staff during 'Welcome Sessions" The principal IT publication for users is the "IT GUIDE" (see Annex VI)

Regular reminders concerning relevant issues are sent using e-mail by the IT Helpdesk

A Privacy Statement is published on the Intranet (see Annex V)

The recommendations of the DPO's are published on the Intranet (see Annex III)

The "Decision On Acceptable Use Of The Committees' Computer System" is published on the Intranet (see Annex II)

8/ Procedures to grant rights of data subjects(rights of access, to rectify, to block, to erase, to object)

An IT application is used for the creation, deletion and modification of user accounts. See also the point above.

9/ Automated / Manual processing operation Automated and manual
10/ Storage media of data
Hard-disk (primary) and tape (backup)
11/ Legal basis and lawfulness of the processing operation
The use of the computer system is necessary for the performance of tasks carried out by the European Economic' and Social Committee and Committee of the Regions as mandated by the treaties.
12/ The recipients or categories of recipient to whom the data might be disclosed
IT Services of other Institutions – Information necessary to establish an e-mail directory – Staff of other
European Institutions with whom bilateral agreements exist
 Administrators of the IT system (technical problem solving and preparation of anonymous statistics), Competent authorities (on request in the context of an investigation)
13/ retention policy of (categories of) personal data
ONLINE INFORMATION:
-Time during which the account is active
LOG-FILES:
- Maximum retention time of 6 months 13 a/ time limits for blocking and erasure of the different categories of data
(on justified legitimate request from the data subject)
(Please, specify the time limits for every category, if applicable)
BLOCKING:
ERASURE:
Data subjects have the right to obtain, without constraint, within three months of the receipt of a request, information regarding the processing of data relating to them. All requests must be submitted in writing. Such a request may be refused only where the provision of such information proves impossible or would involve for
the department concerned an effort disproportionate to the final purpose
14/ Historical, statistical or scientific purposes
If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification,
Anonymous statistics are kept on the use of the IT system. These are used for reporting to the hierarchy and
trend analysis.
15/ Proposed transfers of data to third countries or international organisations
N/A
16/ The processing operation presents specific risk which justifies prior checking (please describe):
N/A

AS FORESEEN IN:
Article 27.2.(a) Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,
Article 27.2.(b) Processing operations intended to evaluate personal aspects relating to the data subject,
Article 27.2.(c)
Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes.
Article 27.2.(d)
Processing operations for the purpose of excluding individuals from a right, benefit or contract,
x Other (general concept in Article 27.1). E-monitoring
17/ Comments N/A
PLACE AND DATE: Brussels, the 18 October 2006
DATA PROTECTION OFFICER: Elena Fierro (for the EESC) and Petra Candellier (for the CoR)
INSTITUTION OR BODY:European Economic and Social Committee and The Committee of the Regions