

REGISTER NUMBER: 286

NOTIFICATION FOR PRIOR CHECKING

Date of submission: 03/09/2007

Case number: 2007-505

Institution: European Commission

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 address of the controller

2) Name and First Name of the Controller: OSIMANI Celso

3) Title: Official

4) Directorate, Unit or Service to which the Controller is attached: C.01

5) Directorate General to which the Controller is attached: JRC

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

26) External Company or Directorate General to which the Processor is attached:

25) External Company or Directorate, Unit or Service to which the Processor is attached:

JRC.C.02

JRC.C.01

3/ Name of the processing

DOSIMETRY MANAGEMENT SYSTEM AT JRC ISPRA

4/ Purpose or purposes of the processing

The purpose of recording the data is to be able to survey and review workers (internal and external) and visitors personal radiation exposure and according to legal and statutory obligations.

5/ Description of the category or categories of data subjects

14) Data Subject(s) concerned:

The persons identified as occupationally exposed to ionising radiation:

- JRC staff
- External staff under contract.
- Visitors.

16) Category(ies) of Data Subjects:

The persons identified as occupationally exposed to ionising radiation:

- JRC staff
- External staff under contract.
- Visitors.

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

17) Data field(s) of Data Subjects:

Attention: Please indicate and describe in the answer to this question also data fields which fall under article 10

Name, family name, personal number, gender, date of birth, date started at the JRC, date left the JRC, employer, radiation category, dosimeter number, radiation exposure.

See the attached radiation passbook and dosimetry schedule (scheda dosimetrica).

Data Entry in DRS - Dosimeter, whole body, radiotoxic, medical examination, other exposure and visitors' name and first name.

Administrative, radiotoxicological and medical data received from radiation dosimeters and the analysis of bodily samples.

Medical data means: Fit to work, not fit to work or fit with restrictions.

This processing of personal data is subjected to Article 10.

18) Category(ies) of data fields of Data Subjects:

Attention: Please indicate and describe in the answer to this question also categories of data fields which fall under article 10

Personal data collected.

This processing of personal data is subjected to Article 10.

7/ Information to be given to data subjects

15a) Which kind of communication(s) have you foreseen to inform the Data Subjects as described in articles 11 - 12 under 'Information to be given to the Data Subject'

The privacy statement (PS) is available for data subjects. The PS full text is attached due to lack of space. The PS will be available at the distribution boards of the dosimeters in each building entrance.

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

15b) Which procedure(s) did you put in place to enable Data Subjects to exert their rights: access, verify, correct, etc., their Personal Data as described in articles 13 - 19 under 'Rights of the Data Subject' :

The data subject can use the functional mailbox "jrc-ispra-dosimetry@ec.europa.eu" - see also privacy statement.

The data subject can refer directly to the controller to exert their rights.

9/ Automated / Manual processing operation

7) Description of Processing:

Attention: Please describe in the answer to this question if you process personal data falling under article 27 "Prior-Checking (by the EDPS - European Data Protection Supervisor)"

Personal radiation dosimeters are given a unique reference number which is used for identification with an internal or external worker or visitor.

At the end of the exposure period the dosimeter is measured. From this raw data the Qualified Expert manually calculates the personal radiation exposure over a prescribed limit in a prescribed time period. This information is then put into the Dosimetry Recording Software (DRS). This software is composed of several different modules associated with specific duties (data entry, enquiries, reports).

The section "enquiries" identifies medicals required by the date chosen and annual radiotoxicological data.

According to the attached European Directives and IAEA Basic Safety Standards workers performing radiation work on other sites require radiation passbooks which is an individual radiological monitoring document and a medical certificate. It contains the holder's previous radiation exposure, medical certification by the JRC. Upon returning to the JRC the employee must return the document to the Dosimetry Service, which enters the data in the Dosimetry Management System.

This personal data processing falls under Art. 27

8) Automated Processing operation(s):

Production of a unique reference number to be used as a dosimeter identifier and linked to a name.

Production of a list of monthly dosimeter readings, radiotoxicology data and whole body monitor data.

Production of a list with medicals required by the date chosen.

Production of the Dosimetry Schedule "Scheda dosimetrica".

Production of the report showing all changes made to the database.

9) Manual Processing operation(s):

Data entry.

Updating of personal data.

Updating of employer data.

Calculation of the personal effective radiation dose from results of the dosimeter radiation exposure by the Qualified Expert.

10/ Storage media of data

Paper and electronic media.

11/ Legal basis and lawfulness of the processing operation

11) Legal basis of Processing:

According to the attached European Directive (96/29), IAEA Basic Safety Standards (No 115) and Italian legislation (241/00, 230/95, 257/01), it is a requirement that a record containing the results of individual radiological monitoring is made for each radiologically exposed worker.

See also European Directive for Outside Workers 90/641.

See also Treaty of EURATOM, Chapter I, Art. 8.: The Commission establishes a Joint Centre for Nuclear Research (CCR = JRC).

12) Lawfulness of Processing:

Answering this question please also verify and indicate if your processing has to comply with articles 20 "Exemptions and restrictions" and 27 "Prior checking (by the EDPS)"

Article 5(a), 45/2001.

This personal data processing falls under Art. 27

12/ The recipients or categories of recipient to whom the data might be disclosed

20) Recipient(s) of the Processing:

JRC Qualified Nuclear Physicist Experts and JRC Medical Officers as identified in European Directive 96/29 and Italian Legislation D.L. 230/95.

Human resources Unit Heads and Directors of respective Data Subjects (Administrative data, medical data, professional risks exposure).

Data transfer follows Article 7. of the Regulation (EC) 45/2001.

21) Category(ies) of recipients:

- Qualified Nuclear Physicist Experts (involved in Ispra as in Italy).
- JRC Medical Officers.
- Hierarchy.

<p>13/ retention policy of (categories of) personal data</p> <p>European Directive 96/29 Section 4, Article 28, IAEA Basic Safety Standards (No 115) and Italian Legislation D.L. 230-Capo VIII, Allegato XI. requires that records are retained during the working life involving exposure to ionising radiation and afterwards until the individual had or would have reached the age of 75 but in any case not less than 30 years from the termination of the work or from the visit date.</p>
<p>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) (on justified legitimate request from the data subject) (Please, specify the time limits for every category, if applicable)</p> <p>22 b) Time limit to block/erase data on justified legitimate request from the data subjects</p> <p>Following a justified and legitimate request by the Data Subject, the personal data will be modified in the database within 14 days.</p>
<p>14/ Historical, statistical or scientific purposes <i>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,</i></p> <p>22 c) 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</p> <p>Anonymous annual statistics.</p>
<p>15/ Proposed transfers of data to third countries or international organisations</p> <p>27) Legal foundation of transfer:</p> <p>Only transfers to third party countries not subject to Directive 95/46/EC (Article 9) should be considered for this question. Please treat transfers to other community institutions and bodies and to member states under question 20.</p> <p>Not applicable</p> <p>28) Category(ies) of Personal Data or Personal Data to be transferred:</p> <p>Not applicable</p>
<p>16/ The processing operation presents specific risk which justifies prior checking (please describe): <i>(please describe)</i>:</p>

7) Description of Processing:

Attention: Please describe in the answer to this question if you process personal data falling under article 27 "Prior-Checking (by the EDPS - European Data Protection Supervisor)"

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12) Lawfulness of Processing:

Answering this question please also verify and indicate if your processing has to comply with articles 20 "Exemptions and restrictions" and 27 "Prior checking (by the EDPS)"

Article 5(a), 45/2001.

This personal data processing falls under Art. 27

Article 27.2.(a) Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,

Processing of data relating to health

Article 27.2.(b) Processing operations intended to evaluate personal aspects relating to the data subject,

n/a

Article 27.2.(c) Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

n/a

Article 27.2.(d) Processing operations for the purpose of excluding individuals from a right, benefit or contract,

n/a

<p>Other (general concept in Article 27.1)</p> <p>n/a</p>
<p>17/ Comments</p> <p>1) Date of submission:</p> <p>10) Comments if applicable:</p> <p>The Dosimetry Recording Software is to provide an electronic alternative to the dosimetry schedule (scheda dosimetrica). This document holds individual personal and radiological information.</p> <p>36) Do you publish / distribute / give access to one or more printed and/or electronic directories? Personal Data contained in printed and/or electronic directories of users and access to such directories shall be limited to what is strictly necessary for the specific purposes of the directory. If Yes, please explain what is applicable.</p> <p>no</p> <p>37) Complementary information to the different questions if applicable, including attachments to this notification which should not be public :</p>
<p>PLACE AND DATE:29/08/2007</p> <p>DATA PROTECTION OFFICER: RENAUDIERE Philippe</p> <p>INSTITUTION OR BODY:European Commission</p>