

REGISTER NUMBER: 349
NOTIFICATION FOR PRIOR CHECKING
<p>Date of submission: 28/03/2008</p> <p>Case number: 2008-193</p> <p>Institution: CEDEFOP</p> <p>Legal basis: article 27-5 of the regulation CE 45/2001⁽¹⁾</p> <p style="text-align: right;">(1) OJ L 8, 12.01.2001</p>

INFORMATION TO BE GIVEN⁽²⁾
<i>(2) Please attach all necessary backup documents</i>
<p>1/ Name and address of the controller</p> <p>Christian F. Lettmayr (Deputy Director) Cedefop P.O.Box 22427 GR-55102 Thessaloniki Greece</p>
<p>2/ Organisational parts of the institution or body entrusted with the processing of personal data</p> <p>Directorate</p>
<p>3/ Name of the processing</p> <p>Day Care Centre</p>
<p>4/ Purpose or purposes of the processing</p> <p>The purpose of the data processing is to admit the staff's children to the Day Care Centre, make the medical records (vaccination and allergies record) available to the Day Care Centre staff</p>
<p>5/ Description of the category or categories of data subjects</p> <p>For the purposes of the prior checking notice, the term "children of staff who attend the DCC" is used.</p>
<p>6/ Description of the data or categories of data (including, if applicable, special categories of data (article 10) and/or origin of data)</p> <p>The data undergoing processing are as follows:</p> <ol style="list-style-type: none"> 1. the inscription form containing name, surname, birth date, school, mother tongue of the child, date of his/her entry to the DCC, presence at DCC as well as names and surnames of both parents, their nationality, employer, office address, telephone number (land and mobile) and the home address; 2. names, addresses and telephone numbers of persons who can take a child from the DCC; 3. a medical file of a child containing information on vaccinations and the state of health, including the allergic reactions; 4. attendance list which contains a name of a child and information on his/her presence at the DCC.

Processing of special data

In the context of processing data on medical files, the file of the data subject may reveal special categories of data such as data concerning health. Such information will only be processed and stored if it is relevant in the context of the case and proportional to the intended purpose.

Cedefop will process such data in compliance with Article 10(2) of Regulation (EC) No 45/2001.

7/ Information to be given to data subjects

Parents can be provided with all information listed in point 6 that concerns their child.

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

Updating of data is initiated by the staff members who have their children at the DCC.

9/ Automated / Manual processing operation

The Day Care Centre files are being processed manually.

10/ Storage media of data

The data is stored in the DCC and is kept in a locked cupboard with limited access.

11/ Legal basis and lawfulness of the processing operation

The legal basis of the processing operation concerning data related to the Day Care Centre the decision of the Management Board of the Centre dated 24 March 2000, ammended by the decision of 25-10-2007 of the Governing Board. (see attached documents)

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

The data* related to the Day Care Centre may be disclosed to the following recipients:

1. Data Controller (with the exception of access to medical information);
2. Personnel of the DCC (with the exception of access to medical information);
3. Administrator in charge of the DCC finances (with the exception of access to medical information);
4. Parents Committee (with the exception of access to medical information).

*Medical data is only accessible by the Personnel of the DCC and no one else.

13/ Retention policy of (categories of) personal data

The kinder garden files should not be kept longer than 6 months after a child leaves the DCC.

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)

not applicable

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,

not applicable

15/ Proposed transfers of data to third parties or international organisations

Medical data could be transferred to the medical institutions in case of an accident taking place at the DCC.

16/ The processing operation presents specific risk which justifies prior checking (*please describe*):

AS FORESEEN IN:

☐ **Article 27.2.(a)**

Processing of data relating to health.

17/ Comments

PLACE AND DATE: Thessaloniki 21-03-2008

DATA PROTECTION OFFICER: Spyros ANTONIOU (Data Protection Officer of Cedefop)

INSTITUTION OR BODY: CEDEFOP