To be filled out in the EDPS' office

REGISTER NUMBER: 351

NOTIFICATION FOR PRIOR CHECKING

Date of submission: 28/03/2008

Case number: 2008-195

Institution: CEDEFOP

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

Bernard Gayraud, Acting Security Officer

Lazaros Tossounidis, Head of Information Technologies and Telecommunications/Facilities area Cedefop

P.O.Box 22427

GR-55102 Thessaloniki

2/ Organisational parts of the institution or body entrusted with the processing of personal data Information Technologies and Telecommunications/Facilities area

3/ Name of the processing

Access control to the premises. (The control of officials, temporary agents, contract agents, contractors, trainees, visitors to the CEDEFOP premises.

4/ Purpose or purposes of the processing

1. Security and safety purposes (in order to know who is in the building at any time);

2. Time recording.

5/ Description of the category or categories of data subjects Cedefop officials, temporary agents, contract agents, contractors, trainees, visitors

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

Processed data contain a data subject's First name, Last name, car plate number (if applicable) (for Cedefop staff, available information is: access card number, time of event, identification of access location)

The security of the Centre is also supported by a CCTV system that is composed of 22 cameras. The records of the video-survailance are kept for up to two months, this processing operation will be subject to a different notification.

7/ Information to be given to data subjects Data subjects are provided with all information listed in section 6. 8/ Procedures to grant rights of data subjects (rights of access, to rectify, to block, to erase, to object) Rights are considered by writen request of Data Subject, Human Resources Department, Head of Resources and Head of Service (where applicable).

9/ Automated / Manual processing operation

For Cedefop staff, this is an automated process through the access points using the clock-in cards (proximity switches RF).

Security guards keep a record of everyone who passes from the front gate in a paper form noting, name, entered, exited time and car plate where applicable, This is independent from the automated process of the access cards. This information is kept into two logs a) staff members where the data goes to the Human Resources department b) visitors where the data remains with the Visitor's book of the security booth.

10/ Storage media of data

Data are stored in:

a) security system in Guard's PC for staff who poccess an access card (Fibus database).

b) Guards visitor log book contain information on the visitors, these are stored in book shelves inside the guard's booth.

11/ Legal basis and lawfulness of the processing operation

The legal basis of the processing operation are Staff Regulations and Cedefop Decision on Access to the building (when available) is attached (See annex)

12/ The recipients or categories of recipient to whom the data might be disclosed Data might be disclosed to data subjects, HR staff and Finance department (in case there is an overtime payment procedure).

13/ Retention policy of (categories of) personal data

For security purposed data are kept from the previous year (i.e. in 2008 all data of 2007 is available). For time recording purposes (in Fibus) they are kept for 10 years.

13 *al* **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*)

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 countries or international organisations Data might be transferred to police, law enforcement institutions (EU controlling bodies) in special cases.

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 security measures,

17/ Comments

PLACE AND DATE: 28-03-2008

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

INSTITUTION OR BODY: CEDEFOP