REGISTER NUMBER: 406

NOTIFICATION FOR PRIOR CHECKING

Date of submission: 22/08/2008

Case number: 2008-487

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 adress of the controller

2) Name and First Name of the Controller:NONNEMAN Stefan

3) Title:Head of Unit

4) Directorate, Unit or Service to which the Controller is attached:R.03

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

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:

3/ Name of the processing

ENTR Enterprise Data Warehouse (EDW) with the sole purpose of producing reports and no processing by other means or information systems.

4/ Purpose or purposes of the processing

0406/ 2008-487

Senior management of DG ENTR expressed the need to generate data that reflects how ENTR projects progress in the DG. This data should be presented under the form of a management scoreboard bringing together data from different sources considered as containing relevant status information. Today, the management scoreboard is subdivided into three parts: financial resources, human resources, and other operational information like internal audit actions and questions of the European Parliament.
Automation will make the scoreboard more reliable from the data quality point of view, it will free up human resources, occupied now by collecting and verifying the data, resulting in the possibility to increase the generation frequency and even to provide real-time generation leading to more effective control and steering. The automation will also offer drill down capabilities which will allow Top Management to get into details (drill down at unit, directorate level, budget line and AMP actions) in their day-to-day analysis.

5/ Description of the category or categories of data subjects

14) Data Subject(s) concerned:

All categories of staff (officials, temporary agents, contract agents, auxiliary staff, SNE) that work, or have worked for DG ENTR.

16) Category(ies) of Data Subjects:

All categories of DG ENTR staff.

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

? person's information : e.g. nationality, birth date, mother tongue, grade.
? job's information : e.g. job description, job functions, appropriation.
? employee's career information : e.g. job assignment, administrative position, job occupation type, statutory link, mobility events
? trainings information : e.g. passport map of the employee, training duration, training date, participation status
? financial information : e.g. financial roles owned by the employee in ABAC
In the attachment the exhaustive list of data fields is added.
Three html files on the source datafields:
1- EDW_TB_HRM_COMFRE_SOURCE.htm for COMREF

EDW_TB_HRM_PRO_SYSLOG_SOURCE.htm for SYSLOG

EDW_TB_HRM_SI2_SOURCE.htm for ABAC

and one HTML file on the data fields in the EDW:

EDW_TB_HRM_PRO.htm

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

? Person's information
? Job's information
? Employee's career information
? Trainings information
? Financial information

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'

A specific privacy statement will be available on-line from the ENTR BO WEBI reporting System once the EDW is deployed in production

---

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' :

EDW operates purely by extracting data from other sources as ABAC, SYSLOG or COMREF. There is no way to change a data in the EDW, the access is read-only for everyone who has access to the data. Only if an employee for a valid reason requests that any reference to his person should be deleted, the Data Protection Controller will accept and guarantee that it will be executed in due time (see 22)

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)"

The EDW is the System in charge of retrieving data from multiple data sources (ABAC, COMREF, SYSLOG, ENTR's in-house financial data), and crossing them between each other. (e.g.: crossing financial data with HR data.).

The main goal is to provide managers with powerful reports presenting metrics of performance, like the 'Scoreboard' report, at destination of the HoUs, Directors and Director General. This report is made of a set of metrics presenting the "health" of the DG at several stages: Financial, HR, acquis communautaire etc. Therefore, it falls under Art. 27.2 c) "processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes", and requires Prior check by the EDPS.

In such a case, Art. 7.2 indicates "? The controller shall be required to verify the competence of the recipient and to make a provisional evaluation of the necessity for the transfer of the data. If doubts arise as to this necessity, the controller shall seek further information from the recipient."

In order to obtain information from the central information systems(ABAC, Sysper2-COMREF, ?) , the Data Protection Controllers of these information systems are officially contacted and informed about the purpose of the EDW.

8) Automated Processing operation(s):

Current situation: Data extraction from COMREF, ABAC, Syslog and in-house ENTR's system.
Future situation: the EDW could retrieve data coming from MIPS system from PMO, in order to have data of type 'missions' and cross them among the other data.
Producing reports showing this data for management purposes.

9) Manual Processing operation(s):

None. Every data retrieved from data providers is extracted automatically by EDW processes running on a daily basis in the evening. In a dataware house data is not changeable by individuals. However if an individual requests that his own data should be "depersonalised", then the data protection controller can request this to be done.

10/ Storage media of data

The data is stored on database servers in the data centre of DIGIT in Luxemburg.

11/ Legal basis and lawfulness of the processing operation

11) Legal basis of Processing:

The processing operations of this Directorate General (DG) internal system is necessary for the performance and the support of the numerous tasks carried out by the DG in the interest of the institution as mandated by the treaties, and more specifically articles 6,7,211 ? 219 and 255 of the Treaty of Amsterdam.
It deals with the implementation of the Treaty, the e?Europe Action Plan, including the derived policy measures and actions on e-Government, and the e-Commission implementation strategy based on actions 7,8 and 9 of the Commission Reform White Paper called for a modern & efficient infrastructure including equivalent office automation technology.
These tasks must be supported by the appropriate functionalities of modern, efficient, reliable and quality management systems.

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)"

This process is lawful because necessary for the proper conduct of the DG's operations and it is in line with Art. 5.1 a) of Reg. 45/2001.

Articles 20 and 27 do apply.

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

20) Recipient(s) of the Processing:

- Authorised personnel of HR Unit from DG ENTR (ENTR.R.2) shall have access to HR data, at the detail of the employee.
- The Head of Unit may will be granted access to HR data (access granted by HR Unit) but exactly limited to that data he has access to in Sysper2, at the detail of the employee andlimited to employees of his unit.
- The HoU can delegate this right to an officer he selects

No other staff will be granted access. Access to the EDW and any other delegation will be granted and approved by the Data Protection Controller

21) Category(ies) of recipients:

HR managers and Head of Units

13/ retention policy of (categories of) personal data

Since a DWH has among other functionalities also the objective is by definition " to keep track of all changes and to show the history of changes, the personal data is kept as long as the purpose of processing subsists.
The Data Protection Controllers of central information systems are officially contacted and informed about the purpose of EDW and are informed about the retention policy via this notification.
Deletion of data may be realised on express demand from an employee, regarding his/her own data.

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)

22 b) Time limit to block/erase data on justified legitimate request from the data subjects

One month delay has to be taken into account. In this case any reference to his person will be erased.

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,

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

A data warehouse is a statistical reporting facility and hence data is kept as long as the purpose of processing is maintained, but on request the data can be depersonalised.

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

27) Legal foundation of transfer:

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.

Not Applicable

28) Category(ies) of Personal Data or Personal Data to be transferred:

Not Applicable
This notification is linked to a generic notification to cover questions 31 - 34. The Notification and Version number is:

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

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)"

The EDW is the System in charge of retrieving data from multiple data sources (ABAC, COMREF, SYSLOG, ENTR's in-house financial data), and crossing them between each other. (e.g.: crossing financial data with HR data.).

The main goal is to provide managers with powerful reports presenting metrics of performance, like the 'Scoreboard' report, at destination of the HoUs, Directors and Director General. This report is made of a set of metrics presenting the "health" of the DG at several stages: Financial, HR, acquis communautaire etc. Therefore, it falls under Art. 27.2 c) "processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes", and requires Prior check by the EDPS.

In such a case, Art. 7.2 indicates "? The controller shall be required to verify the competence of the recipient and to make a provisional evaluation of the necessity for the transfer of the data. If doubts arise as to this necessity, the controller shall seek further information from the recipient."

In order to obtain information from the central information systems(ABAC, Sysper2-COMREF, ?) , the Data Protection Controllers of these information systems are officially contacted and informed about the purpose of the EDW.

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)"

This process is lawful because necessary for the proper conduct of the DG's operations and it is in line with Art. 5.1 a) of Reg. 45/2001.

Articles 20 and 27 do apply.

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

n/a

   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,

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,

n/a

Other (general concept in Article 27.1)

n/a

17/ Comments

1) Date of submission:

10) Comments if applicable:

EDW is aimed at retrieving data coming from different domains, and make them communicate . Reports that shall be created on EDW are solely for DG ENTR's internal purpose.
In the future, and in the context of the IT Governance supported by DIGIT, EDW might be deployed at EC level, and reports created on EDW shall be solely for EC's internal purpose.

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.

no

37) Complementary information to the different questions if applicable, including attachments to this notification which should not be public :

PLACE AND DATE:22/08/2008

DATA PROTECTION OFFICER: GEORGES Louis

INSTITUTION OR BODY:European Commission