# **REGISTER NUMBER: 457**

### NOTIFICATION FOR PRIOR CHECKING

Date of submission: 15/01/09

Case number: 2009-036

Institution: ETF

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

RAMSAYER OLIVIER, Head of Administration Department

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

Administration Department (All staff of HR Unit, ITM Administrators), Reception, Onsite Security Service, Internal Auditor Capability

# 3/ Name of the processing

ETF Site Management and Security

### 4/ Purpose or purposes of the processing

For security and safety during site management duties. To ensure that ETF Staff, information, buildings and equipment are adequately protected against threats to their security. To maintain the level of security at an acceptable level for the management and staff. To ensure that ETF management fulfils its obligations of "Duty of Care" to staff on site. Site management aims at providing support to the whole of ETF in the fields of: building maintenance and repairs, management of conference rooms, office space allocation, inventories, cleaning, recycling and waste, mailing, vending machines, while respecting the priorities set on health, safety and ergonomics as well on budget issues

# 5/ Description of the category or categories of data subjects

CEOS statutory staff at ETF (TAs, CAs) or ENDs, interim workers, trainees, stagiairs, visitors

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

Surname, First Name, Tel Number, Email, Car Registration. From data subject, self registration.

# 7/ Information to be given to data subjects

N/A

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

# 9/ Automated / Manual processing operation

Storage on entry

Retrieval on adminsitrator request

# 10/ Storage media of data

Lotus Notes (electronic form)

# 11/ Legal basis and lawfulness of the processing operation

ETF ICS Continuity of services; DPR 303 /59; 883 12/78;626/1984; 81/2008; E/96/280/1997; Council Regulation 1605/2002, 1995/2006; see Site Management Procedure

Moreover, processing operation is clearly covered by the mandate of ETF, processing operation is necessary for compliance with a legal obligation of ETF, processing operation is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering a contract, processing operation for which the data subject has unambiguously given his/her consent, processing operation necessary in order to protect the vital interests of the data subject

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

ITM Technical staff/ On-site Security sevices (for Visitor and badge system)

### 13/ retention policy of (categories of) personal data

Under defintion currently – easure planning being implemented

# 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)

1 working day

# 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,

Νo

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

No

# 16/ The processing operation presents specific risk which justifies prior checking ( please describe ): AS FORESEEN IN:

# **b 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,

Other (general concept in Article 27.1)

# 17/ Comments

PLACE AND DATE: Turin, 17 December 2008

DATA PROTECTION OFFICER: Dr Liia KAARLÕP

INSTITUTION OR BODY: EUROPEAN TRAINING FOUNDATION