

<b>REGISTER NUMBER: 459</b>
<b>NOTIFICATION FOR PRIOR CHECKING</b>
<p>Date of submission: 15/01/2009</p> <p>Case number: 2009-038</p> <p>Institution: ETF</p> <p>Legal basis: article 27-5 of the regulation CE 45/2001<sup>(1)</sup></p> <p style="text-align: right;"><i>(1) OJ L 8, 12.01.2001</i></p>

<b>INFORMATION TO BE GIVEN<sup>(2)</sup></b>
<i>(2) Please attach all necessary backup documents</i>
<p><b>1/ Name and adress of the controller</b> Bent Sørensen, Head of External Communication Unit, ETF</p>
<p><b>2/ Organisational parts of the institution or body entrusted with the processing of personal data</b> ETF ECU (External Communication Unit) officials</p>
<p><b>3/ Name of the processing</b> ETF Contacts Management</p>
<p><b>4/ Purpose or purposes of the processing</b> To create data base of ETF contacts for staff use, to disseminate ETF information and publications both in printed and electronic format, to produce invitationand participants lists for ETF events.</p>
<p><b>5/ Description of the category or categories of data subjects</b> The wider ETF Community and possibly the general public</p>
<p><b>6/ Description of the data or categories of data (including, if applicable, special categories of data (article 10) and/or origin of data)</b> surname, first name, telephone, fax, e-mail, address, nationality, gender, mother tongue, knowledge of other languages, place of work, job title, web address. data is collected mainly trough the annual contact up date survey, but also via ETF events, personal contacts (exchange of business card) and trough spontaneaus requestes</p>
<p><b>7/ Information to be given to data subjects</b> N/A</p>
<p><b>8/ Procedures to grant rights of data subjects (rights of access, to rectify, to block, to erase, to object)</b> Data subjects can, through annual e-mail update survey, update the data related to them. In case of rectification or erasure, e-mail tool could be used.</p>

<p><b>9/ Automated / Manual processing operation</b> Electronic production of lists for events, mailings. These list maybe sent to external TPs. Internal consultation of contacts details by ETF Staff.</p>
<p><b>10/ Storage media of data</b> Lotus Notes Contact Data Base and Excel lists</p>
<p><b>11/ Legal basis and lawfulness of the processing operation</b> ETF External Communication Strategy, ETF Events Policy and ETF Dissemination Policy  Moreover, processing operation is clearly covered by the mandate of ETF - As center of expertise ETF is obliged to disseminate its information to its target publics; 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 AIM for events and OPOCE for dissemination; processing operation for which the data subject has unambiguously given his/her consent Annual request to ETF contacts to maintain details in ETF Contact Database</p>
<p><b>12/ The recipients or categories of recipient to whom the data might be disclosed</b>  All ETF Staff for consultation</p>
<p><b>13/ retention policy of (categories of) personal data</b> As long as the subject wishes to be included in the DB</p>
<p><b>13 a/ time limits for blocking and erasure of the different categories of data</b> (on justified legitimate request from the data subject) (Please, specify the time limits for every category, if applicable) N/A</p>
<p><b>14/ Historical, statistical or scientific purposes</b> <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> No</p>
<p><b>15/ Proposed transfers of data to third countries or international organisations</b> No</p>
<p><b>16/ The processing operation presents specific risk which justifies prior checking ( please describe ):</b> AS FORESEEN IN:</p> <p><input type="checkbox"/> Article 27.2.(a) Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,</p> <p><input type="checkbox"/> Article 27.2.(b) Processing operations intended to evaluate personal aspects relating to the data subject,</p> <p><input type="checkbox"/> Article 27.2.(c)  Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,</p> <p><input type="checkbox"/> Article 27.2.(d)  Processing operations for the purpose of excluding individuals from a right, benefit or contract,</p> <p><input type="checkbox"/> <b>Other (general concept in Article 27.1)</b></p>
<p><b>17/ Comments</b>  PLACE AND DATE: Turin, 15 December 2008  DATA PROTECTION OFFICER: Dr Liia KAARLÖP  INSTITUTION OR BODY: EUROPEAN TRAINING FOUNDATION</p>