REGISTER NUMBER: 642
NOTIFICATION FOR PRIOR CHECKING
Date of submission: 18/11/2010
Case number: 2010-937
Institution: ENISA
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 Udo Helmbrecht P.O. BOX 1309 71001 HERAKLION GREECE
2/ Organisational parts of the institution or body entrusted with the processing of personal data Administration
3/ Name of the processing Reclassification of temporary agents
4/ Purpose or purposes of the processing Reclassification of temporary agents
5/ Description of the category or categories of data subjects Temporary agents of ENISA

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

Name and grade of staff member.

7/ Information to be given to data subjects

Information given concerns eligibility, reclassification and merit points and finally recassified staff.
Rights are determined as per Regulation (EC) 45/2001. In general full access is possible.

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

Right to have access: Contact ENISA service in charge of the processing
Right to rectify:Contact ENISA service in charge of the processing
Right to block: conditionally granted as it affects pension rights. Contact ENISA service in charge of the processing
Right to erase:conditionally granted as it affects pension rights. Contact ENISA service in charge of the processing
Right to object: conditionally granted as it affects pension rights. Contact ENISA service in charge of the processing

9/ Automated / Manual processing operation

Automated and manual processing are combined and they depend on the stage of the request.

10/ Storage media of data

Paper archives. Data files on storage area network.

11/ Legal basis and lawfulness of the processing operation
art. 10 CEOS; art. 7 Regulation (EC) 460/2004

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

Human resources staff in charge of appraisal procedures, Reporting Officers, Head of the Administration, Executive Director, members of the joint reclassification Committee.

13/ retention policy of (categories of) personal data

35 years IOT ensure consistent records concerning exercising rights such as pension rights.

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)
It is possible to request and obtain the erasure and blocking of personal data. The service in charge of processing (HR) needs guidance with regard to the time limits applied for doing so, as there is a risk of destroying data that is essential to support rights such as pension rights.

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,
N/A

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

N/A

16/ The processing operation presents specific risk which justifies prior checking (*please describe*):
Attribution of rights might be affected by means of processing made.

   Article 27.2.(b)
Processing operations intended to evaluate personal aspects relating to the data subject,

17/ Comments
Please note the controller's question in point 13 a) regarding time-limit for blocking and erasure of the different categories of data. Please also refer to the attached documentation

PLACE AND DATE: HERAKLION 18/11/2010

DATA PROTECTION OFFICER: Emmanuel MAURAGE

INSTITUTION OR BODY: European Network Information Security Agency