

(To be filled out in the EDPS' office)

REGISTER NUMBER: 920

(To be filled out in the EDPS' office)

NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 22/10/2012

CASE NUMBER: 2012-0916

INSTITUTION: EUROPEAN TRAINING FOUNDATION (ETF)

LEGAL BASIS: ARTICLE 27-5 OF THE REGULATION CE N° 45/2001⁽¹⁾

INFORMATION TO BE GIVEN²

1/ NAME AND ADDRESS OF THE CONTROLLER

Ms. Madlen Serban, Director of the European Training Foundation (ETF)
Villa Gualino, V.le Settimio Severo 65, I-10133 Torino, Italy

2/ ORGANISATIONAL PARTS OF THE INSTITUTION OR BODY ENTRUSTED WITH THE PROCESSING OF PERSONAL DATA

Operational Departments (GEO, TED and EBPM)

3/ NAME OF THE PROCESSING

OPS Outsourced expertise

4/ PURPOSE OR PURPOSES OF THE PROCESSING

To ensure, whenever needed, that external services in support of the implementation of OPS work programme (WP) are procured, performed and managed timely, in the most cost-effective manner within the ETF legal regulatory framework and according to high quality standards.

¹ OJ L 8, 12.01.2001.

² **Please attach all necessary backup documents**

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

Contractors' and contracted experts

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA (*including, if applicable, special categories of data (Article 10) and/or origin of data*).

Information contained in CVs (e.g. Name, surname, work experience, education and training, mother tongue, knowledge of other languages, personal skills and competences). Information contained in LEF and BAF modules for the creation of third parties (Name, address, VAT number, company registration details, bank account details).

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

No specific information is provided to experts contracted on the use of the information contained in the CVs, however it is understood that the information related to work experience and education and training is of public domain.

A Privacy Statement for Legal Entity and Bank Account Validation is available in the EC budget website:http://ec.europa.eu/budget/contracts_grants/info_contracts/financial_id/financial_id_en.cfm

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS
(Rights of access, to rectify, to block, to erase, to object)

The rights of data subject are granted through the following procedure: a written request (including emails) by Data Subject addressed to Data Controller with the request to access/rectify/block/erase or object.

9/ AUTOMATED / MANUAL PROCESSING OPERATION

Collection of CV is made manually using a functional mail box.

The selection is a manual processing operation.

The payment is automated via ABAC.

10/ STORAGE MEDIA OF DATA

Paper copies of CVs are kept by ETF staff involved in the assessment of experts' CVs, to be destroyed after the selection is terminated.

Electronic copies are saved in the Operations K drive. The K drive is accessed by all OPS staff; documents are saved in folders not protected with passwords.

Name of the experts contracted is registered in an excel file stored in K drive.

LEF and BAF paper copies are printed for the purpose of processing the third party and destroyed afterwards.
Electronic copies are stored in the OPS Fin & Proc Cell inbox (Lotus Notes system).

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

This processing operation is based on the ETF Work Programme and on contracts stipulated between the ETF and the different contractors.

12/ THE RECIPIENTS OR CATEGORIES OF RECIPIENT TO WHOM THE DATA MIGHT BE DISCLOSED

Head of GEO Department and back up, as well as Head of Units within department have access to CVs as they are requested to approve the selection put forward by the team.

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

The electronic copies of CV of experts are saved in the Operations K drive and are kept for indefinite period of time.

LEF and BAF data inserted in ABAC will not be deleted, once the third party is validated.

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS

One month from the receipt of a request.

(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.

No.

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:

↑ Article 27.2.(b)

Processing operations intended to evaluate personal aspects relating to the data subject,

The data subject is evaluated for becoming an expert at the ETF.

↑ Article 27.2.(d)

Processing operations for the purpose of excluding individuals from a right, benefit or contract,

The outcome of the process might be the exclusion of the data subjects from the contract as expert.

17/ COMMENTS

PLACE AND DATE: TURIN,

DATA PROTECTION OFFICER: MS. TIZIANA CICCARONE

INSTITUTION OR BODY: THE EUROPEAN TRAINING FOUNDATION