(To be filled out in the EDPS' office)

NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 22/10/2012

CASE NUMBER: 2012-0917

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 $\,$

Administration – ICT

3/ NAME OF THE PROCESSING

Telephone Use

4/ PURPOSE OR PURPOSES OF THE PROCESSING

The purpose of the processing is to ensure payment of private phone calls.

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

All ETF staff members: TAs, CAs, ENDs, interim workers, trainees.

¹ OJ L 8, 12.01.2001.

² Please attach all necessary backup documents

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

Name, Surname, phone number, date, hour, duration, complete phone number called, cost, amount of units, destination country or local cell phone service provider.

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

Data subjects are informed about the purpose of the processing.

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

Manual importing from Telephone system and email sent to all telephone users. Automated approval for phone cost reimbursement by the ETF staff members.

10/ Storage media of data

The data is stored in a Lotus Notes Database on one ETF server in the Data Centre.

11/ $\hfill legal basis and lawfulness of the processing operation$

Regulation (EC) No. 1339/2008 of the European Parliament and of the Council of 16 December 2008 establishing a European Training Foundation (recast);

Governing Board's Decision ref. GB/11/DEC/011 on "the ETF organisational structure", adopted on 15 June 2011;

Director's Decision ref. ETF/11/DEC/014 on "the consolidation of the ETF structure", adopted on 1 July 2011.

12/ $\,$ $\,$ the recipients or categories of recipient to whom the data might be disclosed

ICT staff members only.

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

One year.

 $13 \; \text{A}/$ $\;$ time limit to block/erase on justified legitimate request from the data subjects

One month from the receipt of the 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

$15/\qquad \text{Proposed transfers of data to third countries or international organisations}$

No.

16/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING (*Please describe*):

AS FORESEEN IN:

f Article 27.2 (c)

Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

The data collected for the present purpose (payment of private phone calls) might be used for different purpose without the information to the data subject, including monitoring of performance.

17/ COMMENTS

PLACE AND DATE: TURIN,

DATA PROTECTION OFFICER: MS. TIZIANA CICCARONE

Institution or body: The European Training Foundation