

(To be filled out in the EDPS' office)
REGISTER NUMBER: 1244

(To be filled out in the EDPS' office)

NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 20/05/2014

CASE NUMBER: 2014-0600

INSTITUTION: EUSC

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

INFORMATION TO BE GIVEN²

1/ NAME AND ADDRESS OF THE CONTROLLER

European Union Satellite Centre
Data Protection Officer: Jean-Baptiste Taupin
Apartado de Correos 511, E-28850 Torrejón de Ardoz, Madrid

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

Head of Administration Division
Registry
Director

3/ NAME OF THE PROCESSING

Request for access to documents or information

Receipt of general mailbox.
Distribute to the correct unit.
Receipt of a proof of delivery.
Analysis of the request.

4/ PURPOSE OR PURPOSES OF THE PROCESSING

The purpose of the processing operation is to ensure appropriate treatment of requests for access to documents or information.

¹ OJ L 8, 12.01.2001.

² **Please attach all necessary backup documents**

Description of the processing operation:

1. - Receipt of the request through different channels: on-line form for access to documents, general mailbox, post, members of the SatCen, individual staff members, Public Organizations.
2. - Analysis of the request, including defining the scope, assessing possible disclosure of documents originating from the SatCen or third parties; consultation with third parties;
3. - Receipt of a proof of delivery;
4. - Analysis of the confirmatory request;
5. - Make a summary of the documentation in the Atlas Database.

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

Any natural person, or any individual acting on behalf of a legal person, who submits a request for access to documents or information.

Any natural person whose identity appears on the documents or information requested.

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA

(including, if applicable, special categories of data (Article 10) and/or origin of data)

Data requested in the on-line form:

- Compulsory information: first name, surname, e-mail address
- Non-compulsory information: organization on behalf of which the request is submitted, contact address, phone number, fax number.

Data that appear on the requested document or information.

Summary of the information.

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

Pursuant to Articles 11 and 12, Regulation (EC) 45/2001, where the data are obtained directly from data subjects data are processed according to the provisions of the above said Regulation and, where applicable, according to the provisions of COUNCIL DECISION 2009/747/CFSP concerning the Staff regulations of the European Union Satellite Centre.

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

(Rights of access, to rectify, to block, to erase, to object)

Pursuant to Regulation (CE) 45/2001 (Article 13 and seq.), data subjects may exercise before SatCen's DPO their rights of access, rectification and blocking using any of the SatCen-accepted means of communication.

Applicants shall be requested to exercise the right of accrediting their identity by attaching supporting identification documents to the written/electronic application; if this right is exercised through an attorney, the relevant powers of attorney granted by the data subject shall be request.

Application of Articles 13 to 18 of Regulation 45/2001.

Each data subject will receive an explanatory letter with details. This gives the possibility to check the exactitude of data and ask for rectification, if necessary.

9/ AUTOMATED / MANUAL PROCESSING OPERATION

The requests for access to documents or information are treated manually. The Case Management System is partially automated.

10/ STORAGE MEDIA OF DATA

Any data contained in IT tools are stored in the Atlas network; this network is used for all SatCen non-classified materials. Servers where the information is to be stored are located in a closed and climate-controlled room whose access is limited to SatCen Director and heads of systems and security. Furthermore, this room is located within a restricted area to which only security-cleared staff has access.

As for connexions to the data network, the connexion of unauthorised devices is prohibited; additionally, certain mobile devices are prohibited within SatCen administrative facilities.

Regarding hard copy files, their use is prohibited within the restricted area; within the administrative area, where only security-cleared staff can access (guests and this-parties may access this area only when escorted by SatCen staff), this information is within each department, located in Registry dependences in a Safe- deposit box.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

The legal basis of the processing operation at stake is:

Article 2.1 y 3.a) No. 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents

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

Personal data submitted by the applicants are not disclosed outside the SatCen. Personal data that appear on the requested document or information may be disclosed to the applicant following an assessment under Article 8 (b) of Regulation (EC) 45/2001.

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

According to the provisions of Article 16 Regulation (EC) 45/2001, data subjects are entitled to have their personal data erased by the controller whenever the processing of personal data is unlawful. Processing of personal data shall be deemed unlawful when the principles of data quality are not met (Article 4) or when processing of data has not a lawful purpose (Article 5); in any case, processing of data outside classified materials is performed in compliance of a legal obligation of the controller, in this case, the purpose for the processing of data consists in the management of the

reception of documents or requests whose recipient is SatCen.

In any event, the data are storage ten years since the end of the year in course, this information are a backed up copy, the original document will be stored by the relevant unit.

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS
(Please, specify the time limits for every category, if applicable)

The data may be blocked and erased in accordance with rights provided respectively for the articles 15 and 16 of the regulations (EC) No. 45/2001 on request of the data subject.

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)*

AS FORESEEN IN:

- 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

N/A

PLACE AND DATE: TORREJÓN DE ARDOZ, MADRID, SPAIN

DATA PROTECTION OFFICER: JEAN-BAPTISTE TAUPIN

INSTITUTION OR BODY: EUSC EUROPEAN UNION SATELLITE CENTRE