

*(To be filled in by the DPO and, where applicable, by the EDPS)*

**NOTIFICATION TO THE DPO  
PRIOR CHECKING BY THE EDPS (WHERE APPLICABLE)**

**DATE OF SUBMISSION TO THE DPO: 10/02/2017**  
**DATE OF SUBMISSION TO THE EDPS: 10/02/2017**

**CASE NUMBER: 2017-0676**

**INSTITUTION: The Committee of the Regions**

**LEGAL BASIS:**

- NOTIFICATION TO THE DPO: ARTICLE 25 OF REGULATION (EC) N° 45/2001<sup>(1)</sup>
- PRIOR CHECKING BY THE EDPS: ARTICLE 27(5) OF REGULATION (EC) N° 45/2001<sup>(2)</sup>

**INFORMATION TO BE GIVEN<sup>3</sup>**

1/ NAME AND ADDRESS OF THE CONTROLLER (WHERE APPLICABLE THE DEPUTY DATA CONTROLLER)

Responsible person: M. Tom HAENEBALCKE, HoU, Directorate E , Unit E3, Working conditions

Delegated responsible person: Dr Eveline MADRID, Medical Officer of the Committee of the Regions and Medical Assistant, Nurse Aliisa Piskonen, Unit E3 / Medical service

2/ ORGANISATIONAL PARTS OF THE INSTITUTION OR BODY ENTRUSTED WITH THE PROCESSING OF PERSONAL DATA (UNIT AND DIRECTORATE OF THE DATA CONTROLLER)

The Committee of the Regions / Directorate E, Human Resources and Finance / Unit E3, Working conditions / Medical Service

3/ NAME OF THE PROCESSING

Office Indoor Climate survey

<sup>1</sup> OJ L 8, 12.01.2001.

<sup>2</sup> OJ L 8, 12.01.2001.

<sup>3</sup> Please attach all necessary supporting documents

#### 4/ PURPOSE OR PURPOSES OF THE PROCESSING

The Office Indoor Climate questionnaire would be used by the CoR Medical Service in the context of specific mission to investigate possible air quality problems in the employees' offices and their prevalence. The questionnaire would be used also during the preventive annual medical check-up to provide background information for the Medical Officer during the discussion about risk factors in individual employee's health.

The Nurse encodes the answers given anonymously by the concerned staff members as electronic data in the Excel form where the prevalence of disturbing environmental factors and symptoms are presented to facilitate the assessment process.

#### 5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

Data subjects are individuals who are employed by the Committee of the Regions and are working on the premises managed by the CoR, regardless of their function group. The questionnaire is sent to data subjects by internal mail and its completion and return via internal mail in sealed envelope addressed to the Medical Officer is on a voluntary basis.

It follows that the present notification constitutes a complement to the general notification made in respect of the processing of medical data by the CoR medical service.

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

For the description of the categories of data, please, see annex I (Office Indoor Climate Questionnaire)

Results for statistical purposes in table form (electronic) do not include any personal data and individual respondents cannot be identified.

#### 7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS AND MEANS OF COMMUNICATION *(ARTICLES 11 & 12)*

Privacy statement (Annex II) is sent out together with the Office Indoor Climate questionnaire.

Provision on Intranet of the full notice about the data processing related to the Office Indoor Climate questionnaire.

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

The data subject has the right to access his personal data, and the right to correct any inaccurate or incomplete personal data, as well as the right to remove the office indoor climate questionnaire from his medical file at any time by sending an email to the COR Medical Officer ([ServiceMedicalCdr@cor.europa.eu](mailto:ServiceMedicalCdr@cor.europa.eu)).

The request is processed within 10 working days.

#### 9/ AUTOMATED / MANUAL PROCESSING OPERATION

The Office Indoor Climate questionnaire is manually processed.

#### 10/ STORAGE MEDIA OF DATA

The completed Office Indoor Climate questionnaire is kept for 30 years in medical file the same as any other medical data.

#### 11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION (*ARTICLE 5*)

Article 1e(2) of the Staff Regulations, which requires that staff are accorded working conditions complying with appropriate health and safety standards.

Council Directive 89/391/EEC of 12 June 1989 on the introduction of measures to encourage improvements in the safety and health of workers at work.

The Office Indoor Climate questionnaire is sent to the data subject together with the privacy statement. The returning of the questionnaire in the provided, sealable envelope to the Medical officer is voluntary. The legal basis can be found in Article 5(d) of Regulation 45/2001 – unambiguous consent of the data subject.

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

Data on individual staff members are kept in their personal medical file, securely archived on the premises of the COR Medical Service. Only the staff in the medical service has access to the personal medical file.

#### 13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

In paper form, the Office Indoor Climate questionnaire - in the medical file: 30 years beyond the end of the service with the Institutions as for all other medical data.

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)

10 working days. A request must be sent to the COR Medical Officer:  
ServiceMedicalCdr@cor.europa.eu

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.*

15/ PROPOSED TRANSFERS OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

No transfer

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

Processing of data relating to health.

AS FORESEEN IN:

1 Article 27.2.(a) of Regulation (EC) 45/2001

17/ COMMENTS

Obligations of the Controller:

By signing this notification form the Controller guarantees that personal data will be:

- processed fairly and lawfully
- collected only for the purpose(s) indicated
- accurate and kept up to date
- kept for no longer than necessary

SIGNATURE:

PLACE AND DATE:.....