

*(To be filled out in the EDPS' office)*  
**REGISTER NUMBER: 1176**

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**NOTIFICATION FOR PRIOR CHECKING**

**DATE OF SUBMISSION: 15/10/2013**

**CASE NUMBER: 2013-1156**

**INSTITUTION: ENISA**

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

**INFORMATION TO BE GIVEN<sup>2</sup>**

1/ NAME AND ADDRESS OF THE CONTROLLER

EXECUTIVE DIRECTOR, ENISA  
ENISA  
PO BOX 1309  
710 01 HERAKLION  
CRETE  
GREECE

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

INFORMATION TECHNOLOGY AND FACILITIES MANAGEMENT UNIT

HUMAN RESOURCES SECTION

3/ NAME OF THE PROCESSING

ENISA staff mobile phone bill payment system (personal calls)

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

<sup>2</sup> **Please attach all necessary backup documents**

4/ PURPOSE OR PURPOSES OF THE PROCESSING

To enable staff to pay for personal calls made on ENISA mobile phones

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

ENISA staff  
Recipients of ENISA staff members' calls (potentially)

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

- Names of ENISA staff
- Phone numbers called

No data that falls within the scope of Article 10 will be processed under this procedure.

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

Data subjects will be provided with information in accordance with the requirements of Article 11 of Regulation 45/2001.

#### 8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

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

In accordance with Regulation 45/2001, data subjects have the rights of access (Article 13), rectification (Article 14), blocking (Article 15), erasure (Article 16) and objection (Article 18).

Data subjects are made aware of these rights and how to exercise them in a Data Protection notice associated with this procedure.

#### 9/ AUTOMATED / MANUAL PROCESSING OPERATION

Manual processing is performed to the extent that, on their receipt from the telephone company, individual phone records are uploaded to individual staff members' personal folders.

Automated processing is carried out to the extent that the total cost of each staff member's personal calls is transmitted to the Human Resources section so that it can, with the data subjects consent, be deducted from salary.

#### 10/ STORAGE MEDIA OF DATA

DATA ARE STORED ELECTRONICALLY ON ENISA'S SECURE SERVER, LOCATED AT ITS HEADQUARTERS IN HERAKLION, GREECE.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

The processing is lawful within the terms of Regulation 45/2001, Article 5, Lawfulness of processing, section:

(d) the data subject has unambiguously given his or her consent

In this respect, data subjects give their consent via the Data Protection notice.

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

ENISA staff – IT Unit personnel  
HR Section personnel

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

DATA PROCESSED UNDER THIS PROCEDURE IS RETAINED FOR A MAXIMUM PERIOD OF 7 YEARS FOR FINANCIAL AUDIT PURPOSES..

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

DATA SUBJECTS MAY MAKE REQUESTS AT ANY TIME. NO LIMITS APPLY.

*(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.*

UNDER THIS PROCEDURE NO DATA IS STORED FOR HISTORICAL, STATISTICAL OR SCIENTIFIC PURPOSES.

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

NO TRANSFERS ARE PROPOSED.

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

It is not foreseen that this process will involve processing requiring prior notification, as defined in Article 27. However, as personal information regarding private phone calls may be involved, a notification is being made to confirm that the process is compliant.

AS FORESEEN IN:

↑ Article 27.2.(a)

*Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,*

No processing of this type of data will take place.

↑ Article 27.2.(b)

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

↑ Article 27.2.(c)

No processing of this type of data will take place.

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

↑ Article 27.2.(d)

No processing of this type of data will take place.

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

↑ Other (general concept in Article 27.1)

No processing of this type of data will take place.

17/ COMMENTS

This notification is being made to provide assurance that ENISA is complying with its obligations under Regulation 45/2001.

Particular regard has been paid to ensuring compliance with the requirements of Regulation 45/2001, Article 36, Confidentiality of Communications, Article 37, Traffic and Billing, and Article 38, Directories of Users.

PLACE AND DATE: HERAKLION 14<sup>TH</sup> OCTOBER 2013

DATA PROTECTION OFFICER: GRAEME COOPER (DEPUTY DPO)

INSTITUTION OR BODY: ENISA