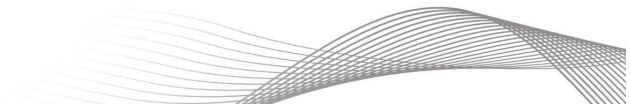


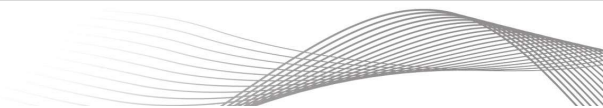
## EDPS record of processing activity

Record of EDPS activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

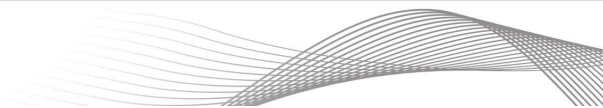
Nr.	Item	Description
		<b>Manual contact tracing in the context of COVID-19 pandemic</b>
1.	Last update of this record	29/03/2021
2.	Reference number	53
3.	Name and contact details of controller	<a href="#">European Data Protection Supervisor (EDPS)</a> <b>Postal address:</b> Rue Wiertz 60, B-1047 Brussels <b>Office address:</b> Rue Montoyer 30, B-1000 Brussels <b>Telephone:</b> +32 2 283 19 00 <b>Email:</b> <a href="mailto:edps@edps.europa.eu">edps@edps.europa.eu</a>  Responsible department: Director's Office  Contact form for enquiries on processing of personal data to be preferably used: <a href="https://edps.europa.eu/node/759">https://edps.europa.eu/node/759</a>
4.	Name and contact details of DPO	<a href="mailto:dpo@edps.europa.eu">dpo@edps.europa.eu</a>
5.	Name and contact details of joint controller (where applicable)	



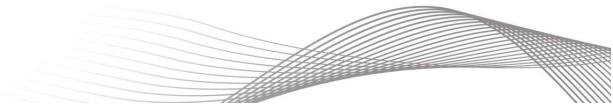
Nr.	Item	Description
6.	Name and contact details of processor (where applicable)	<p>By virtue of the EDPS-EC SLA, the EC is a data processor for personal data related to EDPS and EDPB staff</p> <p>More specifically, the EC services in charge are: DG.HR.D.3, Working Conditions and the Medical Service.</p> <p><a href="mailto:HR-MAIL-D3@ec.europa.eu">HR-MAIL-D3@ec.europa.eu</a></p> <p>In accordance with the Cooperation agreement signed with European Parliament (EP) providing for services such as cleaning of EDPS building, the EP acts as data processor.</p>
7.	Short description and purpose of the processing	<p>The overall objective of the processing activities under this record is to ensure the necessary public health measures and to protect EDPS staff by containing and preventing the spread of the Coronavirus (COVID-19) in the current emergency. For this purpose additional information, including health related data, needs to be collected and retained, to allow for identification of infected individuals, persons suspected to be contaminated and persons at risk. Health related data, is primarily collected and coordinated by the Medical Service of the European Commission. This procedure is not applicable to staff members who will not generate a chain of contamination at the office (e.g. staff members who are exclusively teleworking and have not come to the office at all in the period during which they were contagious, namely have not been physically present in the office over the last 3 days before the first appearance of symptoms).</p> <p>In case meetings are necessary to be held during the confinement period, the aforementioned data are collected for the same purpose.</p>
8.	Description of categories of persons whose data the EDPS processes and list of data categories	<p>In order to carry out this processing operation, the Medical Service collects the following categories of personal data:</p> <ul style="list-style-type: none"> <li>• identification data (first and last name, service, place of employment)</li> <li>• health-related data in relation to COVID-19: <ul style="list-style-type: none"> <li>○ medical status (positive COVID-19 confirmed; COVID-19 symptoms; info on positive COVID-19 confirmed case(s) in staff member's household, symptoms of household members – no names in the latter case)</li> <li>○ result of the test (when the need for testing has been confirmed)</li> </ul> </li> </ul>



Nr.	Item	Description
		<ul style="list-style-type: none"> <li>○ time of onset of COVID-19 symptoms, if appropriate</li> <li>○ list of close contacts with the staff member who tested positive or is suspected of being infected over the last 3 days before the first appearance of symptoms</li> <li>○ number of the office of the staff member who tested positive or is suspected of being infected</li> <li>○ time of recovery necessary for resuming work of the staff member who tested positive or is suspected of being infected</li> </ul> <p>Alternatively, the above list of information can be provided by the staff member to Belgian health authorities via the staff member's general practitioner (GP) or via the Belgian contact tracing procedure.</p>
9.	Time limit for keeping the data	<p>Personal data, processed for the above-mentioned purposes, will only be processed and stored for the duration necessary to fulfil the objectives of the processing. Anonymised data might be kept longer for statistical purposes.</p> <p>Thus, following the complete tracing of the contacts of the staff member who tested positive or is suspected of being infected, the data collected <b>will be stored for a maximum of 14 days</b> and then deleted in due time and/or anonymised.</p> <p>Data related to office locations in relation to confirmed or suspected COVID-19 cases are kept in an identifiable format <b>for a maximum of one week from the time it was reported in order to organise disinfection</b> or sealing of an office or other necessary premises.</p>
10.	Recipients of the data	<p>Access to personal data in accordance with a strict need to know principle will be provided to:</p> <ul style="list-style-type: none"> <li>• The EC's Medical Service in Brussels (medical officer or other medical professionals who are bound by medical confidentiality) - full access to the above-mentioned categories of personal data</li> <li>• EDPS Director and the line manager of the staff member who tested positive or is suspected of being infected: access to identification data (first and last name, service)</li> </ul>



Nr.	Item	Description
		<ul style="list-style-type: none"> <li>• HR correspondent: access only to anonymous information related to the fact that there is a staff member who tested positive or is suspected of being infected. This anonymous information is necessary to be conveyed during inter-institutional meetings discussing common EUIs strategy against COVID-19.</li> <li>• Person in charge of contacting the EP in order to organise disinfection of the office (office number)</li> <li>• EP DG INLO, in charge of organising disinfection (office number)</li> <li>• Person (contractual) in charge of disinfection the office (office number)</li> </ul> <p><b>Communication of data to other EUIs</b></p> <p>In case a staff member who tested positive or is suspected of being infected was in contact with staff of other EUIs, the EDPS needs to transmit personal data to the other EUI whose staff was in contact with the above-mentioned EDPS staff member. Should such a case arise, the EDPS will verify that the transfer of personal data complies with the provisions of Recital 21 of the Regulation (EU) 2018/1725 ('the Regulation') and more specifically that the data are required for the legitimate performance of tasks within the competence of the recipient.</p> <p><b>Communication of data to local health authorities</b></p> <p>Should local health authorities request information from the EDPS on staff members who tested positive or are suspected of being infected, the EDPS could transfer such data only if it complies with the provisions of Article 9 of the Regulation (provided that the local health authority establishes that the request for transmission of personal data falls within its legal duties to implement a contact tracing operation). Only limited and necessary personal data will be transmitted to the local health authority.</p> <p>The line manager acts as longa manus of the Director/employer and is also responsible for guaranteeing the health and safety of staff according to Article 1(2)(e) of the Staff Regulations. The line manager should be informed only if the infected staff member has been in the office in</p>



Nr.	Item	Description
		the three days before the appearance of symptoms and will adopt the measures deemed necessary such as informing possible contacts of its team.
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No transfers envisaged
12.	General description of security measures, where possible.	<p>Strict need to know principle to be applied.</p> <ul style="list-style-type: none"> <li>- Electronic file: data are kept in the secured drive of the person responsible for the management of the procedure in the Human Resources Unit.</li> <li>- For the medical record : data are stored either in an encrypted and secured drive in a cupboard in a locked office to which only a restricted of the EC Medical Service colleagues have access on a need-to-know basis</li> </ul>
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	Data protection notice is available internally

