

01 - Title of personal data processing	Staff Committee elections' eVote processing
02 - Reference	96
03 - Submission Date	16/11/2020
04 - Last update	
Part A of RECORD of processing activities according to Article 31 Regulation 2018/1725 (publically available)	Please consult the relevant EDPS guideline in your sector, if it exists, or : https://edps.europa.eu/data-protection/our-work/our-work-by-type/guidelines_en (this url is not working with Internet Explorer, use Chrome or Firefox).
Controller(s) of data processing operation (Article 31.1(a))	In case of more than one controller, see Article 28.
05 - Name and contact details of controller	
Name of the Controller	MEERT Stefan
Unit responsible for the processing the activity	Executive Director
Controler's functional mailbox	SCElection2020@era.europa.eu
06 - DPO	DataProtectionOfficer@era.europa.eu 120 Rue Marc Lefrancq, 59300 Valenciennes, France Tel. +33 (0) 32 70 96 500
07 - Name, contact details of joint controller (where applicable)	
Who is actually conducting the processing? (Article 31.1(a))	The data is processed by a third party (e.g. contractor) (Art. 29 – Processor)
08 - Name and contact details of processor (where applicable)	Election Buddy Inc. https://electionbuddy.com
Purpose of the processing (Article 31.1(b))	The reason why the personal data are processed and what is intended to achieve and the underlying reason for the processing. The individual steps used for the processing are described.If there is the need (later on) to further process the data for another purpose, the Data Subject must be informed in advance.
09 - Purpose of processing	The purpose of the processing is to allow for remote voting in the Staff Committee elections. The voting will be possible from any device/location with an internet connection, through the use of the internet browser of the data subject's choice (IE, Edge, Chrome, Firefox, Safari, Opera,...)
Description of data subjects and personal data categories (Article 31.1(c))	Description of the categories of persons affected and which data about them will be processed.
10 - Description of the categories of a - data subjects	ERA staff entitled to vote in Staff Committee elections

b - personal data	<p>First name</p> <p>Family name</p> <p>Agency email address</p> <p>Voting key</p> <p>Vote, including:</p> <p>Voted options</p> <p>Timestamp of the vote</p> <p>IP address of the vote</p> <p>Verification code</p>
Retention time (Article 31.1(f))	For how long data is retained and the related justification for this retention period? If appropriate, differentiate between the categories of personal data. If the retention period is unknown, please indicate the criteria for determining it.
11 - Time limit for keeping the data	Personal information will only be retained for a maximum period of 30 days, to allow for the implementation of Article 17 of the Rules Governing the election of the Staff Committee.
<p>Recipients of the data (Article 31.1(d)) Recipients are all people to whom the personal data are disclosed (“need to know principle”). Not necessary to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS).</p>	
12 - Recipients of the data	<p>Staff Committee Election Committee Chairperson</p> <p>ITFM Team Leader</p>
Transfers to third countries or International Organisations (Article 31.1(e))	If the personal data are transferred outside the EU, this needs to be specifically mentioned, since it increases the risks of the processing operation (Article 47).
13 - Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<p>Data is transferred for processing to Election Buddy, Inc. (https://electionbuddy.com).</p> <p>Election Buddy Inc. is a canadian company subject to the PIPEDA Act.</p> <p>The EC has issued an adequacy decision for Canada.</p>
General description of security measures, where possible (Article 31.1(g))	Please specify where the data are stored (paperwise and/or electronically) during and after the processing. Specify how they are protected ensuring “confidentiality, integrity and availability”. State in particular the “level of security ensured, appropriate to the risk”.

14 - How is data stored? What are the security measures implemented?

The processing of the data is as follows:

1. The Chairperson of the Election Committee provides to the system the list of voters, including their name and email address. The Staff Committee Election is configured at Election Buddy as a 'High integrity' election (<https://support.electionbuddy.com/article/452-integrity-and-ballot-access>) with 'Secret Ballot' (<https://support.electionbuddy.com/article/457-the-voter-anonymity-setting>).
2. The voters receive an email from the system with their unique voting key, embedded in the voting link.
3. When the voters cast her/his vote, the system registers a unique random verification code, the timestamp and the IP address. The verification code is emailed to the voter by the system and the recipients of personal data cannot trace back the verification code to the voter.
4. The Chairperson of the Election Committee can:
 - Spoil votes that should be invalidated for any reason (e.g. a mistake in the census granting voting rights to someone not entitled...)
 - Surface the voting key of a voter (e.g. if the voter experiences difficulties and wants to delegate the vote to the Chairperson of the Election Committee)
 To guarantee the auditability of the process, both actions are reflected in the system, in the voters list and in the verification codes list.
5. Voters can review their vote with their voting key at <https://electionbuddy.com/ballot>. Full details on the process and the security measures can be found at Election Buddy's website in the following links:
 - <https://electionbuddy.com>
 - <https://electionbuddy.com/security>
 - <https://support.electionbuddy.com>
 - <https://support.electionbuddy.com/article/357-voting-overview---the-process-for-voters>
 - <https://support.electionbuddy.com/article/417-ssl-security>

Information/Transparency (Article 14-15)	Information shall be given in a concise, transparent and easily accessible form, using clear and plain language.
15 - For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable) see the data protection notice	Link sent to the data subjects with the invitation to vote.
Data subject rights (tick if "Anytime")	<ul style="list-style-type: none"> Right to have access Right to rectify Right to erase ("right to be forgotten) Right to restrict of processing Right to data portability Right to object

Part B - Compliance check and risk screening (internal) - Compliance check (Articles 4 and 5)

16 - Legal Basis	Agency Regulation (EU) 2016/796 Staff Regulations and CEOS and implementing Rules
17 - Lawfulness of processing	The processing is necessary to comply with the legal obligation of setting up a Staff Committee, and thus lawful according article 9 of the Staff Regulations and implements the Agency Rules Governing the election of the Staff Committee and Annex II, Section 1, Article 1 of the Staff Regulations on the Staff Committee.
18 - Data minimisation	Only the data required for the processing, its security and auditability is gathered and processed.
19 - Accuracy	
High risk identification	
20 - Threshold assessment, fill in the specific Threshold assessment-Risks entry in sharepoint.	<p>Some risky processing operations require additional safeguards and documentation.</p> <p>Special category of data is considered:</p> <ol style="list-style-type: none"> 1. data relating to health, (suspected) criminal offences or otherwise considered sensitive ('special data categories'); 2. evaluation, automated decision making or profiling; 3. monitoring data subjects; 4. new technologies that may be considered intrusive. <p>Yes/No, if yes, mention which one from the above it is under field 21 below</p> <p>If any of these data concerned, you need to do a DPIA-see DPIA procedure.</p>
21 - Special category data	
Part C - Related documents (internal)	
22 - DPIA	
23 - Link to the Threshold assessment-Risks	
24 - Other related documents	