

<b>01 - Title of personal data processing</b>	<b>COVID-19: Red Scenario implementing measures</b>
02 - Reference	99
03 - Submission Date	31/03/2021
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 : <a href="https://edps.europa.eu/data-protection/our-work/our-work-by-type/guidelines_en">https://edps.europa.eu/data-protection/our-work/our-work-by-type/guidelines_en</a> (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	RICOTTA Salvatore
Unit responsible for the processing the activity	Resources and Support Unit
Controler's functional mailbox	horsu-office@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 ERA (responsible unit) itself
08 - Name and contact details of processor (where applicable)	NA
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	In the RED scenario, the access to the ERA Headquarters is prohibited. However, when exceptions apply, personal data is processed for monitoring the use and the occupancy of the building. The Agency has set up a procedure in order to establish access to its building during the Covid-19 pandemic. The aim of this procedure is to curb the spread of COVID-19 virus (for example, as a result of crowded floors). Persons can enter the building only based on prior authorisation of the Executive Director or of the Head of RSU. Authorisations could be denied in relation to occupancy thresholds. The Reception Desk operators record the access to the building in a MS Excel table that is stored on the COVID-19 intranet site. This file is accessible by all the ERA authorised users that have been granted an ERA account.

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

The following categories of data subjects can be distinguished:  
Statutory and  
Non-statutory staff  
that are authorised to enter the building.

b - personal data

The following categories of data are processed:  
Last name and first name,  
Delivery of individual protection device (mask),  
Delivery of hydrogel.

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 data will be kept as long as it is necessary to verify presence in the office and possibly apply contact tracing measures and verify reasonable rotation of individuals. The maximum retention period for data in the intranet site is up to three months from the recording day. After this period, the personal data will be anonymised and might be used in an aggregated form (per floor) for HR and H&S possible future policies and joint policies with other EU institutions. Once aggregated, personal data will be deleted.

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).

12 - Recipients of the data

The recipients of the personal data are authorised Agency staff dealing with the COVID-19 pandemic response plan. All recipients of the data are reminded of their obligation not to use the data for any further purpose other than the ones for which they were collected.

The personal information collected will not be communicated to third parties.

In case there is the need to share your data with third parties, you will be notified with whom your personal data has been shared.

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?

No personal data transfer.

General description of security measures, where possible (Article 31.1(g)) security ensured, appropriate to the risk". 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 s

14 - How is data stored? What are the security measures implemented? All personal data is stored in electronic format (a Microsoft Excel file) in the COVID-19 intranet site. The access to this file is granted based on the authentication mechanism based on user and password.

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 ERA makes available: the privacy statement and information on how data subjects can exercise their rights will be permanently available to data subjects in Register of Records; specific link in the COVID-19 intranet site; available at the ERA website: enclosed to this record.

Data subject rights (tick if "Anytime")  
 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  
 Right to obtain notifications to 3rd parties  
 Right to have recourse

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

16 - Legal Basis Staff Regulations and CEOS and implementing Rules

17 - Lawfulness of processing This processing is necessary for the management and functioning of the Agency and in particular Articles 1(e) and 59 (1) of the Staff Regulations and Article 16 of the CEOS. Therefore, the processing is lawful under Article 5(a) of the Regulation (EU) No 2018/1725.

18 - Data minimisation The user information are kept at the minimum required detail in order to perform the required monitoring.

19 - Accuracy All the information related to the data subjects are checked and validated against the available Agency's records.

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.  Special category of data is considered:</p> <ol style="list-style-type: none"> <li>1. data relating to health, (suspected) criminal offences or otherwise considered sensitive ('special data categories');</li> <li>2. evaluation, automated decision making or profiling;</li> <li>3. monitoring data subjects;</li> <li>4. new technologies that may be considered intrusive.</li> </ol> <p>Yes/No, if yes, mention which one from the above it is under field 21 below  If any of these data concerned, you need to do a DPIA-see DPIA procedure.</p>
21 - Special category data	Not applicable.
Part C - Related documents (internal)	
22 - DPIA	Not required
23 - Link to the Threshold assessment-Risks	
24 - Other related documents	