



**European Research Council**  
Executive Agency

Established by the European Commission

## RECORD OF PERSONAL DATA PROCESSING

Art. 31 of the 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 (henceforth the "Data Protection Regulation")

Record n°

DPO 18-2020

In accordance with Article 31 of the data protection regulation, individuals whose personal data are processed by the Executive Agency in any context whatsoever are to be protected with regard to the processing of personal data and the Executive Agency has to keep records of their processing operations.

This record covers two aspects:

1. Mandatory records under Art 31 of the data protection regulation (recommendation: make the header and part 1 publicly available)
2. Compliance check and risk screening (initial; part 2 is internal only to the Agency, not published)

The ground for the record is (tick the relevant one):

- Regularization of a data processing operation already carried out
- Record of a new data processing operation prior to its implementation
- Change of a data processing operation.
- Migration from notification to record

### ERCEA Internal Communication Activities - Tools

1	<b>Last update of this record if applicable</b>	ERCEA intranet: DPO 26-2012 / <a href="#">Ares(2013)3453697 - 11/11/2013</a>  ERCEA [Who is Who] and birthday calendar on intranet: DPO 27-2012 / <a href="#">Ares(2014)2635568 - 08/08/2014</a>  Photos and videos of ERCEA staff members and participants in events on the "staff events" section of the ERCEA collaborative platform: DPO 32-2012.
2	<b>Short description of the processing</b>	The Internal Communication (IC) Team of the European Research Council Executive Agency (ERCEA) coordinates a wide range of activities within the Agency with the purpose of connecting staff to the mission, culture and

	<p>values of the organisation (i.e. staff engagement and corporate/community spirit) and delivering timely and quality information to the staff and the access to multiple communication channels.</p> <p>The activities of the IC Team include:</p> <ol style="list-style-type: none"> <li>1. Communicating with staff about the Agency and the EC's mission, decisions and activities;</li> <li>2. Organising and promoting internal events and campaigns including staff engagement activities;</li> <li>3. Developing Collaborative Platforms for internal communication purposes.</li> </ol> <p>The IC Team uses different internal tools and means of communication for their daily activities that require the handling of personal data. These tools are the ERCEA intranet, which offers the Who is Who, blogs and collaborative platforms; and internal publications including the ERCEA internal magazine "Inside", the HR eBulletin, emailing, signage and postages. For special events or occasions, the IC Team may also provide promotional goods or materials to its staff members.</p> <p>Generally, the personal data processed includes names, contact details (email address, office location, etc.), information related to the contractual relationship and careers (job title, description, achievements, publications, missions, etc.) including the publication of media content (photos, video, audio recordings) and the data subjects are mainly asked to provide their consent.</p>
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### Part 1 - Article 31 Record

<b>3</b>	<b>Function and contact details of the controller</b>	Head of Human Resources Unit (ERCEA.D.2)  <a href="mailto:ERC-INTERNAL-COMMUNICATION@ec.europa.eu">ERC-INTERNAL-COMMUNICATION@ec.europa.eu</a>
<b>4</b>	<b>Contact details of the Data Protection Officer (DPO)</b>	<a href="mailto:ERC-DATA-PROTECTION@ec.europa.eu">ERC-DATA-PROTECTION@ec.europa.eu</a>
<b>5</b>	<b>Name and contact details of joint controller (where applicable)</b>	N/A
<b>6</b>	<b>Name and contact details of processor (where applicable)</b>	Directorate General for Communication (DG COMM)  Directorate-General for Informatics (DG DIGIT)  <a href="mailto:DIGIT-DATA-PROTECTION-COORDINATOR@ec.europa.eu">DIGIT-DATA-PROTECTION-COORDINATOR@ec.europa.eu</a>  External providers for the deployment of communication services and dispatch of communication materials. The external service providers vary according to the specific needs of the Agency.

		Information on the processor is provided in the dedicated DPN.
7	<b>Purpose of the processing</b>	<p>The overall purpose of the processing is to provide clear, consistent, factual and timely information to all staff about the Agency and other European institutions and bodies.</p> <p>The different tools that the IC uses (i.e. the ERCEA intranet and internal publications) aim to accomplish the overall objective.</p> <p>Particularly, these tools are meant to:</p> <ul style="list-style-type: none"> <li>- Promote effective communication among staff within the Agency;</li> <li>- Increase staff engagement in the Agency and corporate/community spirit;</li> <li>- Knowledge sharing of the mission, work and objectives of the Agency;</li> <li>- Provide up-to-date information on organisational and operational matters, both at Agency and EC level;</li> <li>- Provide easy access to practical information on the working environment;</li> <li>- Share useful information with the staff, including social activities;</li> <li>- Increase ERCEA's visibility at EC level.</li> </ul>
8	<b>Description of the categories of data subjects</b>	<p>Whose personal data are being processed?</p> <p><input checked="" type="checkbox"/> <b>EA staff</b></p> <p>[Contract Agents, Temporary Agents].</p> <p><input checked="" type="checkbox"/> <b>Visitors to the EA</b></p> <p><input checked="" type="checkbox"/> <b>Contractors providing goods or services</b></p> <p>[Interim staff, intra-muros experts and consultants].</p> <p><input type="checkbox"/> Applicants</p> <p><input checked="" type="checkbox"/> <b>Relatives of the data subject</b></p> <p><input type="checkbox"/> Complainants, correspondents and enquirers</p> <p><input type="checkbox"/> Witnesses</p> <p><input checked="" type="checkbox"/> <b>Beneficiaries</b></p> <p>[ERC grantees].</p> <p><input checked="" type="checkbox"/> <b>External experts</b></p> <p>[Seconded National Experts].</p> <p><input checked="" type="checkbox"/> <b>Other:</b></p> <p>[Blue Book trainees].</p>

		<p>[Publications may contain information on ERCEA staff members, ERC Scientific Council Members, ERC grantees and people involved in ERC projects, activities and events organised by the ERCEA (e.g. EC staff, external speakers, trainees, external staff)].</p>
<p><b>9</b></p>	<p><b>Description of personal data categories</b></p> <p>Indicate <b>all</b> the categories of personal data processed and specify which personal data are being processed for each category (between brackets under/next to each category):</p>	<p><i>Categories of personal data:</i></p> <p><input checked="" type="checkbox"/> <b>in the form of personal identification numbers</b></p> <p>[Personnel numbers].</p> <p><input checked="" type="checkbox"/> <b>concerning the physical characteristics of persons as well as the image, voice or fingerprints</b></p> <p>[Audio-visual material (i.e. photos, videos, audio recordings)].</p> <p><input type="checkbox"/> concerning the data subject's private sphere</p> <p><input type="checkbox"/> concerning pay, allowances and bank accounts</p> <p><input checked="" type="checkbox"/> <b>concerning recruitment and contracts</b></p> <p>[Job title, job ID, administrative assignment, job description synthetic description of tasks and hierarchical information].</p> <p><input checked="" type="checkbox"/> <b>concerning the data subject's family</b></p> <p>[Content may address or show information on the data subject's family].</p> <p><input checked="" type="checkbox"/> <b>concerning the data subject's career</b></p> <p>[Achievements, career developments, etc.].</p> <p><input type="checkbox"/> concerning leave and absences</p> <p><input checked="" type="checkbox"/> <b>concerning missions and journeys</b></p> <p>[Information on professional trips].</p> <p><input type="checkbox"/> concerning social security and pensions</p> <p><input type="checkbox"/> concerning expenses and medical benefits</p> <p><input checked="" type="checkbox"/> <b>concerning telephone numbers and communications</b></p> <p>[Telephone number and office location].</p> <p><input checked="" type="checkbox"/> <b>concerning names and addresses (including email addresses)</b></p> <p>[First name, surname, email address and private address].</p> <p><input checked="" type="checkbox"/> <b>Other:</b></p> <p>[Birthday (day and month)]</p>

<p>10</p>	<p><b>Retention time (time limit for keeping the personal data)</b></p>	<p><i>Categories of personal data processing likely to present specific risks:</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> data relating to suspected offences, offences, criminal convictions or security measures</li> <li><input type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct)</li> </ul> <p><i>Categories of personal data whose processing is prohibited, with exceptions (art. 10 new Regulation):</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> revealing racial or ethnic origin</li> <li><input type="checkbox"/> revealing political opinions</li> <li><input type="checkbox"/> revealing religious or philosophical beliefs</li> <li><input type="checkbox"/> revealing trade-union membership</li> <li><input type="checkbox"/> concerning health</li> <li><input type="checkbox"/> genetic data, biometric data for the purpose of uniquely identifying a natural person</li> <li><input type="checkbox"/> concerning sex life or sexual orientation</li> </ul> <p><i>Specify any additional data or explanatory information on the data being processed, if any:</i></p> <p><u>Staff members may voluntarily disclose additional personal information.</u></p> <p><u>Audio-visual material may reveal sensitive data (such as racial or ethnic origin). However, this processing operation is not meant to process images containing special categories of data.</u></p> <p>Authorised personnel in charge of managing the ERCEA intranet (the Intranet Coordinators and Correspondents) regularly review the content available on our intranet and update the information as necessary.</p> <p>Content is stored on the ERCEA intranet until it is updated, deleted or replaced. Once deleted, content goes into the recycle bin where, by default, is automatically erased after 30 days. Content is online for a maximum period of two years.</p> <p>Photos and videos are available online for maximum 10 years.</p> <p>Content of historical relevance (for example, photos taken at ERC or ERCEA milestone events such as the ERCEA 10th Anniversary) may be kept for an indefinite period.</p> <p>Personal data appear on the Who is Who as long as the data subject is an active staff member of the ERCEA. However, your data remain on your personal file for a period of 8 years after the extinction of all your rights and of any dependants, and for at least 100 years after the date of your recruitment (Common Commission-Level Retention List (SEC(2019)900)/2).</p> <p>Is any further processing for archiving purposes in the</p>
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11	<p><b>Recipients of the data</b></p>	<ul style="list-style-type: none"> <li>• Staff of the EU institutions and bodies have access to the ERCEA intranet via My IntraComm;</li> <li>• Access to audio-visual material (photos, videos, audio recordings): <ul style="list-style-type: none"> <li>- Audio-visual material published on the ERCEA intranet are accessible to all staff of the EU institutions and bodies having access to the intranet page.</li> <li>- Audio-visual material recorded during internal events may be available to ERCEA staff only.</li> </ul> </li> </ul> <p>The information on whether the pictures and videos will be accessible only to ERCEA staff or published on the ERCEA intranet will be indicated in the DPN specific to the event.</p> <ul style="list-style-type: none"> <li>• Access to pages on collaborative sites, including blogs, may be limited to the Agency, certain ERCEA services or ERCEA working groups only. In these cases, the following statement <i>“this page is only accessible to ERCEA staff”</i>, or similar, will be added and visible to the concerned staff members;</li> <li>• Authorised personnel in charge of managing the ERCEA intranet and other communication and media channels;</li> <li>• Authorised staff members in the IT Unit (D.1), DG DIGIT and DG CNECT in charge of developing, hosting and maintaining the IT system;</li> <li>• The Office for Infrastructure and Logistics (OIB);</li> <li>• External providers for the deployment of communication services or the delivery of communication materials.</li> </ul> <p>In addition, certain administrative details may be disclosed, in compliance with the relevant current legislation and established case law, and on a temporary basis to legislative or supervisory bodies of the ERCEA, as well as auditing bodies or courts.</p>

12	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	N/A
13	<b>General description of the technical and organisational security measures</b>	<ul style="list-style-type: none"> <li>- Access to the two server rooms is restricted to the LSA Team and the Head of Unit D.1; it is controlled by badge and pin code.</li> <li>- Access to the DIGIT datacentre is restricted to DIGIT authorized staff; it is controlled by badge and pin code.</li> <li>- SYSPER: is protected with the European Commission's EU Login password system.</li> <li>- Access to the ERCEA intranet content is controlled via active directory authentication.</li> <li>- Access data on the Shared Drive and SharePoint is only given to authorised personnel.</li> <li>- Access to the ERC Internal Communication functional mailbox (FMB) <a href="mailto:ERC-INTERNAL-COMMUNICATION@ec.europa.eu">ERC-INTERNAL-COMMUNICATION@ec.europa.eu</a> is limited to authorised members of the ERCEA staff.</li> </ul>
14	<b>Information to data subjects/Data Protection Notice</b>	<p>A Data Protection Notice on the ERCEA intranet is available:</p> <ul style="list-style-type: none"> <li>- On the intranet page of the Agency: <a href="http://intranet.ercea.cec.eu.int/services/human-resources/priv/Pages/default.aspx">http://intranet.ercea.cec.eu.int/services/human-resources/priv/Pages/default.aspx</a>.</li> <li>- Under the "Disclaimer" of the intranet page: <a href="http://intranet.ercea.cec.eu.int/Pages/Disclaimer.aspx">http://intranet.ercea.cec.eu.int/Pages/Disclaimer.aspx</a>.</li> </ul> <p>The Data Protection Notice on the ERCEA Who is Who is available under the Privacy tab of the Who is Who and at:</p> <p><a href="http://intranet.ercea.cec.eu.int/services/human-resources/priv/Pages/default.aspx">http://intranet.ercea.cec.eu.int/services/human-resources/priv/Pages/default.aspx</a>.</p> <p>The Data Protection Notice to inform data subjects when they register to an event will be distributed with the registration/invitation specific for each event.</p> <p>For the privacy statement of the Commission's intranet (My IntraComm), please refer to the following link: <a href="https://europa.eu/!uQ89TG">https://europa.eu/!uQ89TG</a>.</p>