



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 29 -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.

ERCEA Continuous Improvement Sharepoint Page

1	Last update of this record if applicable	25/09/2020
2	Short description of the processing	Staff can submit their own work-related ideas for improvement in an online form. These ideas are to be then stored in an online tracker. The tracker will be available to anyone with access to the agency intranet. http://intranet.ercea.cec.eu.int/Pages/2020/Continuous-Improvement.aspx
(This part may be public) Part 1 - Article 31 Record		
3	Function and contact details of the controller	Director ERC-CONTINUOUS-IMPROVEMENT@ec.europa.eu

4	Contact details of the Data Protection Officer (DPO)	ERC-DATA-PROTECTION@ec.europa.eu
5	Name and contact details of joint controller (where applicable)	
6	Name and contact details of processor (where applicable)	N/A
7	Purpose of the processing	The ideas for improvement to be submitted by the staff through this platform will be used by the Continuous Improvement team (part of the Directorate of ERCEA). These submissions will be the official channel for requesting the support of the CI team. The support of the CI team can be in the form of either support to or leading of a project with the goal of implementing the proposed idea. The CI team will use the submitted information as: a) Reference for an initial assessment of the potential benefits/effort of the proposal, as well as evaluation by the advisory committee (to be created) b) Tracking of ongoing improvement projects. These data (staff name and staff ideas) need to be processed in order to have a structured set of inputs that is comparable across the different ideas for improvement, which is essential for having a fair prioritisation of the corresponding improvement projects. The inputs initially submitted can be updated by the submitter and/or the CI team member assigned to support them (update of status of the project, projects benefits calculation, description of the solution, estimated end date, etc.).
8	Description of the categories of data subjects	Whose personal data are being processed? ☒ EA staff (Contractual and temporary staff in active position) ☐ Visitors to the EA ☐ Contractors providing goods or services ☐ Applicants ☐ Relatives of the data subject ☐ Complainants, correspondents and enquirers ☐ Witnesses ☐ Beneficiaries ☐ External experts ☐ Contractors ☒ Other, please specify: ERCEA interimaire agents, SNE, trainees.

9	Description of personal data categories Indicate all the categories of personal data processed and specify which personal data are being processed for each category (between brackets under/next to each category):	<i>Categories of personal data:</i> ☐ in the form of personal identification numbers ☐ concerning the physical characteristics of persons as well as the image, voice or fingerprints ☐ concerning the data subject's private sphere ☐ concerning pay, allowances and bank accounts ☐ concerning recruitment and contracts ☐ concerning the data subject's family ☐ concerning the data subject's career ☐ concerning leave and absences ☐ concerning missions and journeys ☐ concerning social security and pensions ☐ concerning expenses and medical benefits ☐ concerning telephone numbers and communications ☒ concerning names and addresses (including email addresses): Full name (as appearing in the Outlook directory) ☒ Other: data subjects ideas on what needs to be improved at the workplace (business processes, etc.). Proposed potential solution, if applicable. <i>Categories of personal data processing likely to present <u>specific risks</u>:</i> ☐ data relating to suspected offences, offences, criminal convictions or security measures ☐ data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct) <i>Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10 new Regulation):</i> ☐ revealing racial or ethnic origin ☐ revealing political opinions ☐ revealing religious or philosophical beliefs ☐ revealing trade-union membership ☐ concerning health ☐ genetic data, biometric data for the purpose of uniquely identifying a natural person ☐ concerning sex life or sexual orientation <i>Specify any additional data or explanatory information on the</i>
-----------------	--	--

		<i>data being processed, if any:</i>
10	Retention time (time limit for keeping the personal data)	<u>Retention time:</u> In the online tracker: Up to 1 year after the improvement idea is either rejected or the improvement project associated to it is cancelled or implemented. The ideas are to be accepted for consideration or rejected as out of scope within a couple of weeks from submission. The duration of the projects will be determined by their nature and complexity, though none is expected to last more than a year. The purpose of this is to have a record of previous improvement initiatives in order to: a) Provide examples of improvements that are acceptable and how to fill in the submission form. b) Avoid overlap in the scope of different ongoing and/or completed projects. Is any further processing for archiving purposes in the public interest, historical, statistical or scientific purposes envisaged? ☒ yes ☐ no ... After this time, it will be stored in a Shared Drive only available to the CI team, for historic record and statistical purposes (reporting of aggregated benefits for all projects concluded within a given time period) The data, as submitted by the original requester, will not have further processing once stored. If the answer is yes, please go to Part 2 Compliance check, Storage and Security for technical safeguards.
11	Recipients of the data	Only staff of ERCEA (including users of the intranet like interimaiores, SNEs and blue book trainees) as appearing in the EC directory. Staff of other DGs or Agencies will not have view over this SharePoint.
12	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	NA

13	General description of the technical and organisational security measures	The security measures are: a) Access restriction based on the access to the ERCEA intranet (that is, staff members using their EU Login password within the corporate network or using secured remote desktop, which requires the EU Login password plus a mobile device second authentication factor) plus being a member of the ERCEA staff, as indicated in the official EC directory (the SharePoint automatically identifies this based on the EU Login credentials), b) Periodic backup copy of the data in Shared Drive of the CI team.
14	Information to data subjects/Data Protection Notice (DPN)	The DPN will appear in the the <i>Background information</i> sub-page of the intranet page for the CI program. It will also appear in the <i>Submit your idea</i> sub-page. In it, the following paragraph will appear: <i>In order to help with alignment of ongoing initiatives, anyone with access to the ERCEA intranet will be able to see the content of what you submit. Therefore, please do not enter confidential information. If, for any reason, you wish to withdraw an already submitted idea, you can write us an email to the CI functional mailbox. All ideas that have already been completed or rejected will be periodically removed from this platform and archived in our team's private Shared Drive.</i>