






European Economic
and Social Committee

Record of processing activity Part 1

Name of the data processing	Publication of staff photos in Staff Page
Created on	01/02/2019
Last update	
Reference number	040
Year	2019
1. Controller:	European Economic and Social Committee
2.a) Service responsible	ADI
2b) contact details	Directorate E - ADI hr-infopoint@eesc.europa.eu
3. Joint controller	
4. DPO: contact details	data.protection@eesc.europa.eu
5. Processor(s) (where applicable)	
6. Purpose(s) of the data processing	Displaying staff photos has been proven to play a key role in facilitating initial contacts within the EESC and is therefore viewed as an essential element of staff information.
7. Description of the categories of persons whose data are processed	EESC staff
8. Description of data categories processed	EESC staff photos

9. Time limit for retaining the data	The duration is linked with the contract of the staff member and can be reduced as the staff member wishes.
10. Recipients of the data	<p>Photos can only be managed by members of the ADI sector and Sysper managers.</p> <p>All individuals having access to the EESC Intranet have access to the photos that the members of staff decided to publish on the Staff Page.</p> <p>Photos of the persons who did not consent to publish their photo on the Staff Page are only stored in Sysper. Only HR staff having access to the relevant Sysper modules can access them.</p>
11. Transfers of personal data to a third country or an international organisation	EESC staff personal data will not be transferred to non-EU Member States or international organisations.
12. General description of security measures, where possible	
13. Privacy statement	Staff photos
Part 2 Compliance check and risk screening	
1.a) Legal basis and reason for processing	<p>necessary for the performance of a task carried out in the public interest</p> <p><input type="checkbox"/> (a) or in the exercise of official authority vested in the Union institution or body</p> <p><input type="checkbox"/> (b) necessary for compliance with a legal obligation to which the controller is subject (see point 1b) below)</p> <p>processing is necessary for the performance of a contract to which the</p> <p><input type="checkbox"/> (c) data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p><input checked="" type="checkbox"/> (d) the data subject has given consent to the processing of his or her personal data for one or more specific purposes</p> <p><input type="checkbox"/> (e) necessary in order to protect the vital interests of the data subject or of another natural person</p> <p>[Tick (at least) one of the boxes]</p>
1b) Legal basis	
2. Are the purposes specified, explicit and legitimate?	Yes
3. Where information is also processed for other purposes, are you sure that these are not	Photos are not used for another purpose.

incompatible with the initial purpose(s)?	
4. Do you really need all the data items you plan to collect?	The data collected (photos) is necessary.
5. How do you ensure that the information you process is accurate?	EESC staff can upload voluntarily their photo in Sysper, which they can remove or change at any time (How to publish your photo?)
6. How do you rectify inaccurate information?	We take new photos when staff ask or when needed.
7. Are they limited according to the maxim "as long as necessary, as short as possible"?	
8. If you need to store certain information for longer, can you split the storage periods?	
9 How do you inform data subjects?	Via a privacy statement on the Intranet Page .
10. Access and other rights of persons whose data are processed	Staff can contact us at hr-infopoint@eesc.europa.eu . The query will be dealt with within 2 working days.
11. Does this process involve any of the following?	<input type="checkbox"/> (a) data relating to health, (suspected) criminal offences or other special categories of personal data <input type="checkbox"/> (b) evaluation, automated decision-making or profiling <input type="checkbox"/> (c) monitoring data subjects <input type="checkbox"/> (d) new technologies that may be considered intrusive
Part 3 Linked documentation	
1. Links to threshold assessment and DPIA (where applicable)	 No hyperlink inserted
2. Where are your information security measures documented?	 No hyperlink inserted
3. Links to other documentation	 No hyperlink inserted
4. Other relevant documents	