

**Record of processing activity
Part 1**

Name of the data processing	Processing of Members' photographs
Created on	30/09/2020
Last update	
Reference number	084
Year	2020
1. Controller:	European Economic and Social Committee
2.a) Service responsible	Directorate D Directorate A
2b) contact details	Directorate D - Communication and Interinstitutional Relations - Press Unit photoEESC@eesc.europa.eu Directorate A - Statutory Bodies and Member's Working Conditions - Registry Unit
3. Joint controller	
4. DPO: contact details	data.protection@eesc.europa.eu
5. Processor(s) (where applicable)	Isopix Photo Agency Rue Fritz Toussaint/Fritz Toussaintstraat, 55/A.4 1050 Bruxelles/Brussel Belgium
6. Purpose(s) of the data processing	

Management of EESC members' photographs

This involves the Directorate D and the Registry Unit processing (taking, saving, using and, if applicable, making minor changes to) photographs of EESC members that will be taken at a session organised for that purpose during the group meetings at each renewal and during inaugural sessions.

The photographs may be used in any of the EESC Directorate D products (newsletters, publications, video clips, presentations, etc.), on the EESC website, and on social media.

The Registry Unit will also use them for the members' portal, the official directory of the European Union (www.whoiswho.europa.eu) and the EESC directory ("Vademecum").

They may also be passed on to external organisations for identification and security purposes in connection with events organised jointly with the EESC.

After the end of the term of office for which they are taken, they may be used for historical purposes, for example to provide evidence of the longstanding membership of the body of a member to be appointed to a key post within the EESC, such as president or vice-president, or elsewhere. However, any data subject may object to this and ask for photographs of them stored in the EESC's databases to be deleted.

7. Description of the categories of persons whose data are processed

EESC members

8. Description of data categories processed

Photographs of the members taken during the photo shoots referred to in point 5 above.

9. Time limit for retaining the data

During the term of office and, unless the data subject objects, afterwards for historical purposes.

10. Recipients of the data

EESC administration (Directorate D and Registry Unit), journalists and the general public, as the photographs will be available on the internet in the interests of public information and transparency.

11. Transfers of personal data to a third country or an international organisation

The photographs may be sent to external organisations (based within the EU) in connection with events organised jointly with the EESC. They will be transferred in accordance with the provisions of Chapter V of Regulation (EU) 2018/1725.

12. General description of security measures, where possible

Access to the database where the photograph files are stored is restricted to staff of the EESC's Directorate D and Registry Unit. In Department, the Directorate D, the controller grants access to the photograph database on an individual basis. The entire Registry Unit has access to the photograph directory in order to manage members' data. Access is also granted to staff in charge of communication in the groups. sections and HR unit and in the president's and secretary general's cabinets.

13. Privacy statement

[Member's photos](#)

Part 2 Compliance check and risk screening

1.a) Legal basis and reason for processing

- necessary for the performance of a task carried out in the public interest
- (a) or in the exercise of official authority vested in the Union institution or body
 - (b) necessary for compliance with a legal obligation to which the controller is subject (see point 1b) below)
 - (c) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
 - (d) the data subject has given consent to the processing of his or her personal data for one or more specific purposes
 - (e) necessary in order to protect the vital interests of the data subject or of another natural person

[Tick (at least) one of the boxes]

1b) Legal basis

The processing is necessary for the performance of the tasks carried out in the public interest by the EESC on the basis of Articles 300 to 304 of the Treaty on the Functioning of the European Union and for the tasks assigned to Directorate D in the EESC's Rules of Procedure (Article 12a) and to the Registry as the manager of EESC members' data

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 incompatible with the initial purpose(s)?




Yes

4. Do you really need all the data items you plan to collect?

Yes

5. How do you ensure that the information you process is accurate?

Members may request access to and modification of their photographs at any time

6. How do you rectify inaccurate information?	The photograph may be replaced at any time at the member's request
7. Are they limited according to the maxim "as long as necessary, as short as possible"?	Yes – It is the duration of the term of office of the members whose photographs have been taken.
8. If you need to store certain information for longer, can you split the storage periods?	Yes – The photographs will be kept for historical purposes once the term of office comes to an end. Members may object to this at any time
9 How do you inform data subjects?	Using a privacy statement that will be given to them when the photographs are taken.
10. Access and other rights of persons whose data are processed	Data subjects may exercise their rights under Regulation (EU) 2018/1725 on request at any time, by e-mailing Directorate D at the following address: photoEESC@eesc.europa.eu .
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	Information on the processing of personal data by the contractor referred to in point 5: ISOPIX (section headed "LES FONDEMENTS JURIDIQUES DU TRAITEMENT ET DE L'UTILISATION DES INFORMATIONS À CARACTÈRE PERSONNEL"): https://www.isopix.be/terms_FR.aspx