




European Economic
and Social Committee

Record of processing activity

Part 1

Name of the data processing	External service providers for IT unit
Created on	13/09/2018
Last update	11/09/2020
Reference number	007
Year	2018
1. Controller:	European Economic and Social Committee
2.a) Service responsible	L3 IT
2b) contact details	helpdesk@eesc.europa.eu
3. Joint controller	Not applicable
4. DPO: contact details	data.protection@eesc.europa.eu
5. Processor(s) (where applicable)	Not applicable
6. Purpose(s) of the data processing	Registration in the Human Resource Management systems of identity of external service providers and their time sheets.
7. Description of the categories of persons whose data are processed	Non-statutory staff, external service providers.

8. Description of data categories processed	Name, sex, date of birth, type of contract, hide or show photograph, internal addresses (telephone N°, office, email address, alias), type of contract, period of contract, function description, company, time sheets.
9. Time limit for retaining the data	1) The data is kept for period of 10 years after the termination of the contract.
10. Recipients of the data	IT Project & Financial Managers
11. Transfers of personal data to a third country or an international organisation	None
12. General description of security measures, where possible	In order to protect personal data, a number of technical and organisational measures have been put in place. These include appropriate measures to address online security, physical security, risk of data loss, alteration or unauthorised access, taking into consideration the risk represented by the processing and the nature of the data being protected.
13. Privacy statement	External service providers
Part 2 Compliance check and risk screening	
1.a) Legal basis and reason for processing	<p style="text-align: center;">necessary for the performance of a task carried out in the public interest</p> <p><input checked="" 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 style="text-align: center;">processing is necessary for the performance of a contract to which the</p> <p><input checked="" 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 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 incompatible with the initial purpose(s)?	Not applicable
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?	Information provided by the contractor.
6. How do you rectify inaccurate information?	Directly in the IT systems.
7. Are they limited according to the maxim "as long as necessary, as short as possible"?	Yes
8. If you need to store certain information for longer, can you split the storage periods?	Yes
9 How do you inform data subjects?	A privacy statement is distributed to new external contractors and is published on the intranet. Regular updates are sent by e-mail regarding data protection.
10. Access and other rights of persons whose data are processed	According to the instructions in the privacy statement.
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

Organisational Security measures

http://jsnet.eesc.europa.eu/en/dl/it/services/index%20of%20service%20to%20pics/sec_mgmt.pdf

Technical security measures

<http://jsnet.eesc.europa.eu/EN/dl/it/Services/Index%20of%20Service%20Topics/Technical%20Security%20Measures.pdf>

3. Links to other documentation

[The basic decisions regarding the IT system \(acceptable use, internet & information security...](#)

4. Other relevant documents

The basic decisions regarding the IT system (acceptable use, internet & information security), privacy statements and information notes regarding personal data & information security:

<http://jsnet.eesc.europa.eu/EN/dl/it/Rules/Pages/default.aspx>