| **Record of processing activity**  
| **Part 1** |
| Name of the data processing: | Ergonomics |
| Created on | 28/09/2018 |
| Last update | |
| Reference number | 012 |
| Year | 2018 |
| 1. Controller: | European Economic and Social Committee |
| 2.a) Service responsible | SECU |
| 2b) contact details | secu@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 | To take stock of the ergonomic status of workstations in order to remedy any shortcomings observed and to collect data in order to identify structural measures to be undertaken as part of efforts to ensure well-being at work. |
| 7. Description of the categories of persons whose data are processed | The following are data subjects: officials, temporary and contract staff, agency staff, seconded national experts, EESC members and their alternates, CCMI delegates and their alternates, and staff made available to the EESC on the basis of service contracts. |
| 8. Description of data categories processed | ```
Data that may be processed under this procedure, provided the data subject consents thereto, relates to:

- last name, first name
- gender
- date of birth
- internal address
- function
- seniority
- working arrangements
- type of furniture and IT installation
- date of visit
- degree of satisfaction of the person with their IT equipment, office space and office furniture
- type of work carried out
- number of years of on-screen work and the number of hours spent daily in front of the screen
- type of work performed (encoding, data consultation, etc.)
- use of spectacles or lenses (type of lenses)
- person's perceived state of health (general fatigue, stress, insomnia, headaches, other - to be specified)
- pain experienced in the back, neck, shoulders, elbows, wrists, forearms, tingling sensation in fingers, legs
- type of post occupied (surveillance, security, contact with third parties).

### 9. Time limit for retaining the data

Data enabling persons to be identified are kept only for the time necessary to identify and implement the correct actions in order to bring the workstation into line with the applicable ergonomic rules. The maximum period for retaining data is one year after the visit.

### 10. Recipients of the data

The data are accessible in a form permitting the data subject to be identified only by the persons responsible for ergonomics within the Directorate for Logistics.

Where appropriate, if specific adjustments to the workstation are required by the state of health of the person concerned, the Medical Service of the institution will be informed in order to give an opinion on the proposed adjustments. Medical data are forwarded and processed only by the institution's Medical Service.

An external contractor specialising in ergonomics may also be called upon to collect and access these data in order to advise the EESC on ergonomics.

As regards data relating to the data subject's self-assessment of their state of health (back pain, neck pain, general fatigue, etc.), it is noted that, as with other data, these data are only collected if the person gives their consent. If special arrangements appear necessary as a result of the self-assessment, the person will be asked to contact the institution's Medical and Social Service in order to describe in more detail the problems encountered and to provide the relevant medical documents. These medical data will not be processed as part of the present data processing operation, but will be processed exclusively by the Medical and Social Service of the institution, which will make a recommendation as to the necessary adjustments.
<table>
<thead>
<tr>
<th>11. Transfers of personal data to a third country or an international organisation</th>
<th>Not applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>12. General description of security measures, where possible</td>
<td>The office where the Security Service files are kept is locked whenever staff are out. The cupboards are also locked. Computer data are accessible only to Security Service staff and are secured by a password.</td>
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<tr>
<td>13. Privacy statement</td>
<td>Ergonomics</td>
</tr>
</tbody>
</table>

**Part 2**

**Compliance check and risk screening**

1a) Legal basis and reason for processing

- necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body
- necessary for compliance with a legal obligation to which the controller is subject (see point 1b) below)
- 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
- the data subject has given consent to the processing of his or her personal data for one or more specific purposes
- 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

Article I(e)(2) of the Staff Regulations: "2. Officials in active employment shall be accorded working conditions complying with appropriate health and safety standards at least equivalent to the minimum requirements applicable under measures adopted in these areas pursuant to the Treaties"

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, all the data are necessary

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

6. How do you rectify
inaccurate information?

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?

No

9. How do you inform data subjects?

The EESC has drawn up a "Privacy Statement" (attached), which is published on the Security Service website.

When a notice is sent on the subject, the link to the Privacy Statement will be included in the message. The Privacy Statement will therefore be given/sent to the data subjects before the individual visit.

10. Access and other rights of persons whose data are processed

In order to exercise their rights, data subjects may contact the data controller: secu@eesc.europa.eu

11. Does this process involve any of the following?

☐ (a) data relating to health, (suspected) criminal offences or other special categories of personal data

☐ (b) evaluation, automated decision-making or profiling

☐ (c) monitoring data subjects

☐ (d) new technologies that may be considered intrusive

Part 3
Linked documentation

1. Links to threshold assessment and DPIA (where applicable)

Click here to insert a hyperlink

2. Where are your information security measures documented?

Click here to insert a hyperlink

3. Links to other documentation

Click here to insert a hyperlink

4. Other relevant documents

Save Cancel