



European Economic  
and Social Committee

### Record of processing activity Part 1

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| Name of the data processing  | E-mail   |
| Created on   | 2/10/2018  |
| Last update  | 11/09/2020   |
| Reference number   | 013  |
| Year   | 2018   |
| 1. Controller:   | European Economic and Social Committee   |
| 2.a) Service responsible   | L3 IT  |
| 2b) contact details  | <a href="mailto:helpdesk@eesc.europa.eu">helpdesk@eesc.europa.eu</a>   |
| 3. Joint controller  | Not applicable   |
| 4. DPO: contact details  | <a href="mailto:data.protection@eesc.europa.eu">data.protection@eesc.europa.eu</a>   |
| 5. Processor(s) (where applicable)                                   | Not applicable   |
| 6. Purpose(s) of the data processing                                 | <p>To enable internal and external communication of Committees' staff and members.</p> <p>To offer to the Committees' e-mail system user the e-mail access to addresses of all internal correspondents and of main external partners (other institutions and bodies, external e-mail addresses of Members etc.).</p> |
| 7. Description of the categories of persons whose data are processed | EESC-COR Members & officials, officials etc. from other European institutions and bodies, subcontractors, European & world citizens. In this context any person as a potential e-mail sender/recipient is also a potential data subject  |

8. Description of data categories processed

GLOBAL ADDRESS BOOK:

EESC-COR Members & officials etc.

Members & officials etc. from other European institutions and bodies

E-mail message content (subject, body and attachments)

E-mail message traffic information (sender, recipient, data, size)

E-mail addresses and address book references

Data fields for the e-mail messages:

- message header (traffic information),
- subject,
- body and
- attachments

For the address book:

- first name,
- last name,
- alias (user name for computer system)
- committee
- office number
- phone number
- unit
- e-mail address
- country, group & bureau (Members)

For the address book of the other European institutions, the office number is not available.

Users may constitute their own personal address book. This address book is not shared. This address book is not controlled by the IT unit.

Log-files are used for solving technical problems and preparing anonymous statistics for trend analysis.

9. Time limit for retaining the data

- As long As the data subject is a Committee official/staff or member
- As long as the data subject is present in the address book of the respective other institutions
- After deletion from the on-line address book, 6 months (maximum backup rotation time)



E-mail messages:

- After deletion by the user, 6 months (maximum backup rotation time)

Log-files:

- Maximum retention time 6 months (maximum backup rotation time)

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| 10. Recipients of the data   | <p>Message recipients: potentially anybody in the world having an e-mail address. Internal e-mail system users: Committee Members &amp; staff. Address book (data fields as indicated in this notification): - Committee members &amp; staff – e-mail services of other institutions – staff of other European institutions with whom bilateral agreements exist. Log-files: - administrators of the e-mail system (daily operations), - competent authorities in the context of investigations.</p>  |
| 11. Transfers of personal data to a third country or an international organisation   | None  |
| 12. General description of security measures, where possible   | <p>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.</p>  |
| 13. Privacy statement  | <a href="#">E-mail</a>  |
| <p><b>Part 2</b><br/><b>Compliance check and risk screening</b></p>  |   |
| 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 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><input type="checkbox"/> (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</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><a href="#">[Tick (at least) one of the boxes]</a></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   |   |

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| collect?   | Yes we need all the data.   |
| 5. How do you ensure that the information you process is accurate?                         | Information provided by HR & Registry units.  |
| 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? | Not applicable  |
| 9 How do you inform data subjects?   | <ul style="list-style-type: none"> <li>• Information on the e-mail system is available on the intranet. This information is mentioned (with indication of the location): <ul style="list-style-type: none"> <li>◦ in the documentation provided to the new officials during the "welcome" sessions</li> <li>◦ in the documentation provided to all users (Members &amp; staff)</li> </ul> </li> <li>• The principal IT publication for end-users is the "IT Guide".</li> <li>• Regular reminders are sent by e-mail concerning relevant issues from the "IT helpdesk".</li> <li>• A privacy statement is published on the intranet</li> <li>• The decision on acceptable use of the Committees' computer system is published on the intranet</li> </ul> |
| 10. Access and other rights of persons whose data are processed                            | Received e-mail messages in a Data Subject mailbox are under his/her full control, thus having ALL the rights on these messages (like accessing, storing and deleting). Those rights do not apply to other copies of the same messages stored in somebody else's mailbox  |
| 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<br><input type="checkbox"/> (b) evaluation, automated decision-making or profiling<br><input type="checkbox"/> (c) monitoring data subjects<br><input type="checkbox"/> (d) new technologies that may be considered intrusive  |
| <b>Part 3</b><br><b>Linked documentation</b>   |   |
| 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%20topics/sec\\_mgmt.pdf](http://jsnet.eesc.europa.eu/en/dl/it/services/index%20of%20service%20topics/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



No hyperlink inserted

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>

E-mail service overview on the Intranet:

<http://jsnet.eesc.europa.eu/EN/dl/it/Services/Pages/E-mailserviceoverview.aspx>