## Record of processing activity
### Part 1

<table>
<thead>
<tr>
<th>Name of the data processing</th>
<th>Publication of staff photos in Staff Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Created on</td>
<td>01/02/2019</td>
</tr>
<tr>
<td>Last update</td>
<td></td>
</tr>
<tr>
<td>Reference number</td>
<td>040</td>
</tr>
<tr>
<td>Year</td>
<td>2019</td>
</tr>
</tbody>
</table>

### 1. Controller:
- European Economic and Social Committee

### 2a) 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

Photos can only be managed by members of the ADI sector and Sysper managers.

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.

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.

### 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

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#### 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 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
- [x] necessary in order to protect the vital interests of the data subject or of another natural person

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.
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>4. Do you really need all the data items you plan to collect?</td>
<td>The data collected (photos) is necessary.</td>
</tr>
<tr>
<td>5. How do you ensure that the information you process is accurate?</td>
<td>EESC staff can upload voluntarily their photo in Sysper, which they can remove or change at any time (<a href="#">How to publish your photo?</a>)</td>
</tr>
<tr>
<td>6. How do you rectify inaccurate information?</td>
<td>We take new photos when staff ask or when needed.</td>
</tr>
<tr>
<td>7. Are they limited according to the maxim &quot;as long as necessary, as short as possible&quot;?</td>
<td></td>
</tr>
<tr>
<td>8. If you need to store certain information for longer, can you split the storage periods?</td>
<td></td>
</tr>
<tr>
<td>10. Access and other rights of persons whose data are processed</td>
<td>Staff can contact us at <a href="mailto:hr-infopoint@eesc.europa.eu">hr-infopoint@eesc.europa.eu</a>. The query will be dealt with within 2 working days.</td>
</tr>
</tbody>
</table>
| 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**

<table>
<thead>
<tr>
<th>1. Links to threshold assessment and DPIA (where applicable)</th>
<th><img src="#" alt="No hyperlink inserted" /></th>
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<tbody>
<tr>
<td>2. Where are your information security measures documented?</td>
<td><img src="#" alt="No hyperlink inserted" /></td>
</tr>
<tr>
<td>3. Links to other documentation</td>
<td><img src="#" alt="No hyperlink inserted" /></td>
</tr>
<tr>
<td>4. Other relevant documents</td>
<td><img src="#" alt="No hyperlink inserted" /></td>
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