

**Record of processing activity
Part 1**

Name of the data processing:	Members' PCR testing
Created on	19/03/2021
Last update	
Reference number	098
Year	2021
1. Controller:	European Economic and Social Committee
2.a) Service responsible	A3 MEM
2b) contact details	helpdesk-membres-cese@eesc.europa.eu StatutdesmembresCESE@eesc.europa.eu
3. Joint controller	
4. DPO: contact details	data.protection@eesc.europa.eu
5. Processor(s) (where applicable)	Test center Laboratoire MEDINA Hoogveld 10 9200 Dendermonde BELGIUM
6. Purpose(s) of the data processing	"Members' Statute" Sector collects and uses the personal information to establish a list of members, delegates, alternates and experts (beneficiaries) to be tested for a possible active infection with the Sars-Cov-2 virus. This listing will help the EESC to verify the right to travel for members, according to the applicable legal obligations.

7. Description of the categories of persons whose data are processed	EESC members
8. Description of data categories processed	<p>Members' Working Conditions Unit collects the following categories of personal data and provides it to the Medical Service: first name, last name, telephone number, e-mail address, country of origin, passport number, if travel scheduled.</p> <p>This data is transmitted to the Medical Service; this data is filled in the document sent to the laboratory, which analyses the PCR swab. The result of the PCR swab is directly delivered from the laboratory to the Member concerned and is also sent by mail to the Medical Doctor.</p>
9. Time limit for retaining the data	<p>The personal data are only kept for the time necessary to fulfil the purpose of collection or further processing.</p> <p>On an individual level: As the test result is kept in the medical file of the member, the retention period as indicated in the privacy statement for medical files is applicable. If the test is positive, the procedure 'contact tracing' is launched and the respective privacy statement applicable with the indicated retention periods.</p> <p>On a collective level: An excel sheet on the dedicated drive of the Medical Service is kept; access is strictly limited on a 'need to know' basis.</p>
10. Recipients of the data	<p>Access to the personal data is provided to the EESC staff responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.</p> <p>A restricted number of staff in the "Members' Statute" Sector (for data collection)</p> <p>The Doctor of the EESC, nurse and medical secretary;</p> <p>The data collected (access to aggregated data only without names (number of tests in total, nr of test with positive and negative result, total number of person) will be used for statistical purposes.</p> <p>The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.</p>
11. Transfers of personal data to a third country or an international organisation	<p>Personal data will not be transferred to third countries or an international organisation.</p>
12. General description of	

security measures, where possible

Concerning physical files

"Members' Statute" Sector do not keep physical files.

The premises of the medical service are locked whenever no one is present. Rooms in which medical files are kept remain locked at all times and only members of the medical service have access to these secure places. Cupboards are also kept locked.

The person responsible for cleaning works with a security guard or a member of staff of the medical service present.

Electronic files

In order to protect the personal data, the EESC has put in place a number of technical and organisational measures.

Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the EESC. Decision 223/19A on information security policy of the EESC and of the CoR, adopted on 4/9/2019, provides for security measures for the protection of both Committees' information systems and the information processed therein against threats to the availability, integrity and confidentiality of these systems and information.

Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

13. Privacy statement

[Members' PCR testing](#)

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

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?	All of the data collected is relevant for the purpose of the PCR testing and the transmission of the results.
5. How do you ensure that the information you process is accurate?	Administrative data is provided by the data subject.
6. How do you rectify inaccurate information?	The data subjects may request that inaccurate data be corrected, by sending an email request to the controller.
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?	N/A
9 How do you inform data subjects?	The privacy statement is joint to the invitation to the PCR testing and available on the webpage which contains information about the PCR testing.
10. Access and other rights of persons whose data are processed	Data subjects may exercise their rights under Regulation (EU) 2018/1725 at any time upon request. The rights and procedures relating to access, correction, blocking, erasure, etc. of personal data are explained in the privacy statement relating to the medical file mentioned above.
11. Does this process involve any of the following?	<input checked="" 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	 No hyperlink inserted

measures documented?

3. Links to other documentation



No hyperlink inserted

4. Other relevant documents