



## NOTIFICATION

### FOR DATA PROCESSING OPERATIONS

Date of registration: 29.6.2011

Register No: FM2

#### 1. Name of the data processing operation

Access cards

#### 2. Data Controller

Programme or Group:	OSE4 / Facilities services
Function:	Head of Operational Services
Contact person:	Sigfús Bjarnason; <a href="mailto:facilities_services@eea.europa.eu">facilities_services@eea.europa.eu</a>

#### 3. Description of the processing operation

##### 3.1. Area of activity in which the processing is carried out

Building security and access control to the premises.

Personal data are collected and further processed for the purpose of the managing access to the EEA premises.

There is no restriction under Article 20 of Regulation (EC) No 45/2001; the processing operation does not require prior checking in accordance with Article 27 of Regulation (EC) No 45/2001.

##### 3.2. Modalities for the processing operation

<input checked="" type="checkbox"/> Manual processing	Photographs of new arrivals to the EEA are taken by a Facilities services' staff member. The photographs are printed on an access card, and the data collected under "automated processing" loaded into the chip on the card, using a special device designed for that purpose.
<input checked="" type="checkbox"/> Automated processing	The data loaded into the chip of the access card is data collected before the actual " <i>Staff access cards processing operation</i> " by the HRM staff (ADS1 group). The HRM introduces the details of a new arrival into the SIC database and generates an email to the Facilities services, prior to the arrival of the person.

	Access to the building is granted by flashing the Access card in front of the card readers placed next to the entry doors and entering a personal 4 digit PIN code associated with the owner of the card. Upon accessing the building by use of the access card, an entry is added to the log file that logs the access to the building
<b>3.3. Are the Personal data processed by an entity external to EEA ('processor')</b>	
<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	No

<b>4. Lawfulness and purpose of the processing</b>
<b>4.1. Legal basis</b>
<ul style="list-style-type: none"> <li>o The processing operation for the staff access cards is necessary for the performance and the support of the numerous tasks carried out by the EEA as mandated by Regulation (EC) No 401/2009; in addition the access card abides by the EEA's security policy and provisions.</li> <li>o Employment and/or service contract with the EEA.</li> </ul>
<b>4.2. Grounds for lawfulness</b>
<ul style="list-style-type: none"> <li>o It is necessary for the performance of a task carried out in the public interest and in the legitimate exercise of official authority for security purposes (Article 5(a) of Regulation (EC) No 45/2001);</li> <li>o The data subject has unambiguously given his or her consent (Article 5(d) of Regulation (EC) No 45/2001).</li> </ul> <p>There are no exemptions or restrictions under Article 20 of Regulation (EC) No 45/2001 and Article 27 of Regulation (EC) No 45/2001 is not applicable.</p>
<b>4.3. Purpose of the processing</b>
Produce access cards for securing access to the building and identifying staff. The access logs that are maintained can be consulted for the purpose of identifying who has entered the building in a specific time span in strict compliance with EEA security policy.

<b>5. Features of the processing operation</b>
<b>5.1. Categories of data subjects concerned</b>
Staff and external consultants that work for the EEA
<b>5.2. Categories of data</b>
Data comprises of photograph, first name and surname, personnel number and employment duration.

## 6. Retention practice of personal data

The personal data is retained for the duration of the employment period for the card data. Anonymous data (photograph) is retained for a longer period solely for historical purpose. Access logs are retained for a period of approximately 3 months.

## 7. Personal data processed for historical, statistical or scientific purposes (Please tick whichever is applicable or indicate 'n/a' (not applicable))

Purpose	Categories of data	Storage media
<input checked="" type="checkbox"/> Historical	Photograph	<input checked="" type="checkbox"/> Anonymous <input type="checkbox"/> Encrypted
<input type="checkbox"/> Statistical	Not applicable	<input type="checkbox"/> Anonymous <input type="checkbox"/> Encrypted
<input type="checkbox"/> Scientific	Not applicable	<input type="checkbox"/> Anonymous <input type="checkbox"/> Encrypted

## 8. Recipients or categories of recipients to whom the data might be disclosed

Limited number of staff in the facilities services managing the access card system.

## 9. Proposed transfer of personal data to third countries or international organisations

Yes  No transfer of personal data to third party countries or international organisations

## 10. Information given to the data subjects as described in Articles 11 & 12 of the Regulation (EC) No 45/2001)

Please refer to notification FM5 – Staff photograph gallery.

At the time when the picture is taken data subjects are informed that their photograph will be used for their individual access card and on the EEA intranet to introduce them to colleagues. Prior to the publication of the photographs on the EEA intranet, the data subjects signed an authorisation (see annex 1 to notification FM5) whereby they give their unambiguous consent to the publication of their photograph, and acknowledge having received a copy of the privacy statement for the EEA staff photograph gallery (annex 2 to notification FM5).

As part of the newcomers programme, staff members are provided with general information on data protection and security in the EEA buildings, and they may acquaint themselves with data protection and security issues through the information available on the EEA intranet.

**11. Procedures to enable data subjects to exercise their rights (as indicated in Articles 13 to 19 of the Regulation (EC) No 45/2001, i.e. access, rectification, blocking, erasure, objection)**

Data subjects have a right to access, update and rectify their data at any time (photograph and name); such information is provided to the data subjects in the privacy statement that they received when they sign the authorisation form prior to the publication of their photographs in the EEA intranet (see annex 2 to notification FM5). In the event of renewal of contract of employment/service contract, the data (duration of the employment) is updated in SIC personnel and forwarded to the facilities services which issue a new access card.

**12. Time limits for blocking and erasure of the different categories of personal data (on justified legitimate request from the data subject – Please, specify the time limits for every category)**

Categories of data	Blocking	Erasure
Any data asked for	Immediately or at maximum within 2 working days	Immediately or at maximum within 2 working days