



NOTIFICATION FORM

FOR DATA PROCESSING OPERATIONS

Date of registration: 28.6.2011

Register No: FM5

1. Name of the data processing operation

Staff photograph gallery

2. Data Controller

Programme or Group:	OSE4 / Facilities and OSE2 / Helpdesk
Function:	Head of OSE Programme
Contact person:	Mr Sigfús Bjarnason; Facilities Services facilities_services@eea.europa.eu ; Helpdesk helpdesk@eea.europa.eu

3. Description of the processing operation

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

Staff and contracted consultants have their photograph taken when taking up their duties in EEA, with their explicit written authorisation. The photograph is placed on the individual Access card issued to the staff member or the consultant, and put on line on the EEA intranet. The photograph will be available in headings like staff directory, telephone and address book, newcomers list, staff board notice, emails, etc... for the duration of the employment contract. Article 27 of Regulation (EC) No 45/2001 on "Prior check (by the EDPS)" is not applicable.

3.2. Modalities for the processing operation

<input checked="" type="checkbox"/> Manual processing	Taking the photograph is a manual process. The photographs are stored in JPEG format in an electronic file.
<input checked="" type="checkbox"/> Automated processing	The distribution of the photographs over the Intranet is automated

3.3. Are the Personal data processed by an entity external to EEA ('processor')?	
<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	No

4. Lawfulness and purpose of the processing	
4.1. Legal basis	
<ul style="list-style-type: none"> ○ The processing operations on the EEA intranet are 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 photograph on the access card abides by the EEA's security policy and provisions. ○ Employment and/or service contract with the EEA. 	
4.2. Grounds for lawfulness	
<ul style="list-style-type: none"> ○ 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 45/2001); ○ The data subject has unambiguously given his or her consent (Article 5(d) of Regulation 45/2001). <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>	
4.3. Purpose of the processing	
To help identifying staff and consultants when they take up duties and to improve internal communication in the EEA and enable the staff to better know each other.	

5. Features of the processing operation	
5.1. Categories of data subjects concerned	
All EEA staff and contracted consultants	
5.2. Categories of data	
<input checked="" type="checkbox"/>	<p>For the access cards:</p> <p>Photograph; first name and surname and personnel number</p> <p>For intranet:</p> <p>Photograph; first name and surname, initials, function, organisation, email address, telephone number, office location</p>

6. Retention practice of personal data

The personal data is retained for the duration of the employment contract. Anonymous data (photograph) is retained for a longer period solely for historical purpose.

7. Personal data processed for historical, statistical or scientific purposes

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

EEA internal

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

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

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

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 attached to this notification) 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 (see annex 2 attached to this notification).

As part of the newcomers programme, all EEA staff members are provided with general information on data protection and they may acquaint themselves with data protection 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)

The data can be viewed on the intranet site of the EEA; data subjects have a right to access, update and rectify their data at any time; such information is provided to the data subjects in the privacy statement that they receive when they sign the authorisation form prior to the publication (see annex 2).

Any request for access, update or rectification of personal data shall be addressed in writing to the facilities services at the following address: facilities_services@eea.europa.eu.

12. Time limits for blocking and erasure of the different categories of personal data

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