



## RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

according to Article 31 of [Regulation \(EU\) 2018/1725](#)

Title
<b>EFSA Correspondence Management</b>

1) Controller(s) <sup>1</sup> of data processing activity (Article 31.1(a))
<p>EFSA unit in charge of the processing activity: Global Planning Services (GPS)</p> <p>EFSA Data Protection Officer (DPO): <a href="mailto:DataProtectionOfficer@efsa.europa.eu">DataProtectionOfficer@efsa.europa.eu</a></p> <p>Is EFSA a co-controller? <span style="margin-left: 150px;"><b>No</b></span></p> <p><b>If yes</b>, indicate who is EFSA's co-controller:</p>

2) Who is actually conducting the processing? (Article 31.1(a))
<p>The data is processed by EFSA itself <span style="float: right;"><input checked="" type="checkbox"/></span></p> <p><i>Indicate the EFSA units or teams involved in the data processing:</i></p> <p>All EFSA staff</p> <p>The processing operation is conducted together with an external party <span style="float: right;"><input type="checkbox"/></span></p> <p><i>Please provide below details on the external involvement:</i></p>

3) Purpose of the processing (Article 31.1(b))
<p>The purpose of the processing is to register and to track the incoming and outgoing correspondence of EFSA.</p>

4) Legal basis and lawfulness of the processing (Article 5(a)–(d)):
<p><i>Processing necessary for:</i></p> <p>(a) a task carried out in the public interest or in the exercise of official authority vested in EFSA <span style="float: right;"><input checked="" type="checkbox"/></span></p> <p>(b) compliance with a legal obligation to which EFSA is subject <span style="float: right;"><input type="checkbox"/></span></p> <p>(c) performance of a contract with the data subject or to prepare such contract</p>

<sup>1</sup> The controller decides on the purposes and means of the data processing. In case of joint controllership (e.g. systems of the European Commission applied by EFSA or jointly with another agency), EFSA is a co-controller.

	<input type="checkbox"/>
(d) The data subject has given consent (ex ante, explicit, informed)	<input type="checkbox"/>
<i>Further details on the legal basis:</i>	

<b>5) Description of the categories of data subjects (Article 31.1(c))</b>	
<i>Whose personal data are processed?</i>	
EFSA statutory staff	<input checked="" type="checkbox"/>
Other individuals working for EFSA (consultants, trainees, interims, experts)	<input checked="" type="checkbox"/>
Stakeholders of EFSA, including Member State representatives	<input type="checkbox"/>
Contractors of EFSA providing goods and services	<input type="checkbox"/>
The general public, including visitors, correspondents, enquirers	<input checked="" type="checkbox"/>
Relatives of the data subject	<input type="checkbox"/>
Other categories of data subjects (please detail below)	<input type="checkbox"/>
<i>Further details concerning the data subjects whose data are processed:</i>	

<b>6) Type of personal data processed (Article 31.1(c))</b>	
<b>a) General personal data</b>	
The personal data concerns:	
Name, contact details and affiliation	<input checked="" type="checkbox"/>
Details on education, expertise, profession of the person	<input type="checkbox"/>
Curriculum vitae	<input type="checkbox"/>
Financial details	<input type="checkbox"/>
Family, lifestyle and social circumstances	<input type="checkbox"/>
Goods and services the person provides	<input type="checkbox"/>
Other personal data (please detail):	<input checked="" type="checkbox"/>
<b>b) Sensitive personal data (Article 10)</b>	
The personal data reveals:	

Racial or ethnic origin of the person	<input type="checkbox"/>
Political opinions or trade union membership	<input type="checkbox"/>
Religious or philosophical beliefs	<input type="checkbox"/>
Health data or genetic or biometric data	<input type="checkbox"/>
Information regarding the person's sex life or sexual orientation	<input type="checkbox"/>

*Further details concerning the personal data processed:*

Incoming and outgoing postal mail as well as exchanges by e-mail of an official and corporate nature between staff of EFSA and third parties.  
Internal mail distribution, signataires and documents.

7) Recipients of the data (Article 31.1(d))	
Line managers of the data subject	<input type="checkbox"/>
Designated EFSA staff members	<input checked="" type="checkbox"/>
Other recipients ( <i>please specify</i> ):	<input type="checkbox"/>

All Staff have access to the DMS OpenText system and the units correspondence.

DMS OpenText permissions are set by the responsible unit and the data is only accessible by the specific Staff involved in the process.

8) Transfers to recipients outside the EEA (Article 31.1 (e))	
Data are transferred to third country recipients:	
Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
<b>If yes</b> , specify to which third country:	
<b>If yes</b> , specify under which safeguards:	
Adequacy Decision of the European Commission	<input type="checkbox"/>
Standard Contractual Clauses	<input type="checkbox"/>
Binding Corporate Rules	<input type="checkbox"/>
Memorandum of Understanding between public authorities	<input type="checkbox"/>

9) Technical and organisational security measures (Article 31.1(g))	
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*How is the data stored?*

- On EFSA's Document Management System (DMS)
- On a shared EFSA network drive or in an Outlook folder
- In a paper file
- Using a cloud computing solution (please detail the service provider and main characteristics of the cloud solution, e.g. public, private)
- On servers of an external service provider
- On servers of the European Commission or of another EU Institution
- In another way (*please specify*):

*Please provide some general information on the security measures applied:*

Currently, the correspondence workflow is managed in OpenText Document Management System (DMS). It is scheduled that from 2021 onwards, the EFSA correspondence management will be supported by the Commission system ARES.

#### 10) Retention period (Article 4.1 (e))

The retention of personal data is established by the common documents retention list. The exact determination of the retention period depends on the duration of administrative utility of documents as well as their legal value, keeping in mind that personal data shall be deleted as soon as the purpose has been achieved.

The concrete period of retention of correspondence depends on their broader classification. These are not processed in the correspondence workflow. The personal data in the correspondence workflow will be retained according to the document categories they fall under. For instance correspondence related to contract management, payments and financial management are kept for 7 year according to the established retention periods.

#### 11) Consultation with the Information Security Officer

Was the ISO consulted on the processing operation ?

Yes  No

*If yes, please provide some details on the consultation with the ISO:*

#### 12) Information given to data subjects (Articles 15 and 16)

*Has information been provided to data subjects on the way their data is processed including how they can exercise their rights (access, rectification, objection, data portability)? Usually*

*this information is provided in a Privacy Statement, specifying the controller's contact details. As possible, please provide a link to the relevant Privacy Statement or a description.*

EFSA staff is informed that personal data is processed in the system solely in support of the purpose of registering and tracking incoming and outgoing correspondence and not for any unrelated purpose. Data processors are made aware of the requirements of confidentiality and data protection. To that end and as far external consultant staff not subject to the Staff Regulations is involved in the electronic workflow (e.g. post office staff), since 2012 external consultants are signing a Confidentiality Declaration before starting their assignment at EFSA.

Last update of this record: 27/02/2020

Reference: DPO/GOV/4