



RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

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

Title
Building access control and badge use

1) Controller(s) ¹ of data processing activity (Article 31.1(a))
<p>EFSA unit in charge of the processing activity: Corporate Services (CORSER)</p> <p>EFSA Data Protection Officer (DPO): DataProtectionOfficer@efsa.europa.eu</p> <p>Is EFSA a co-controller? No</p> <p>If yes, 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 X</p> <p><i>Indicate the EFSA units or teams involved in the data processing:</i></p> <p>CORSER staff, including the EFSA Security Officer.</p> <p>The processing operation is conducted together with an external party X</p> <p><i>Please provide below details on the external involvement:</i></p> <p>Building guards based on an outsourcing service contract (company IVRI).</p>

3) Purpose of the processing (Article 31.1(b))
<p>The purpose of the processing is to enable building access control, ensuring physical security of persons, assets and goods inside the EFSA premises.</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 X</p>

¹ 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.

- (b) compliance with a legal obligation to which EFSA is subject
- (c) performance of a contract with the data subject or to prepare such contract
- (d) The data subject has given consent (ex ante, explicit, informed)

Further details on the legal basis:

5) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are processed?

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 checked="" type="checkbox"/>
Contractors of EFSA providing goods and services	<input checked="" type="checkbox"/>
The general public, including visitors, correspondents, enquirers	<input checked="" type="checkbox"/>
Relatives of the data subject	<input checked="" type="checkbox"/>
Other categories of data subjects (please detail below)	<input checked="" type="checkbox"/>

Further details concerning the data subjects whose data are processed:

Three main categories of data subjects:

Group 1 = statutory staff, interim workers, trainees, panel experts and consultants for long-term contract

Group 2 = visitors, provided with a magnetic visitors badge, complemented on case-by-case basis by paper badges, indicating the name of the person, the title of the EFSA meeting attended and the expiry date

Group 3 = staff/service providers with special access credentials

The range of data subjects concerned may extend to any visitors at EFSA premises for service delivery or on special occasions, such as EFSA Open Days or special events, to which also staff's relatives and friends are allowed access following appropriate security clearance.

6) Type of personal data processed (Article 31.1(c))

a) General personal data

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) Sensitive personal data (Article 10)	
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"/>
<i>Further details concerning the personal data processed:</i>	
<ul style="list-style-type: none"> - ID-cards or other official identification documents that visitors and persons having ad hoc presence at EFSA premises show and are registered at the EFSA reception against a temporary magnetic visitor's badge and the corresponding registration of the ID documents ; - Magnetic Personal badges of Group 1 (= statutory staff, interim workers, trainees, panel experts and consultants for long-term contract), and Group 3 (= staff/service providers with special access credentials) indicating the name, picture, staff number and, as applicable, the expiry date of the employment period at EFSA ; - Magnetic visitors badges (Group 2) +Paper badges, indicating the name of the person, the title of the EFSA meeting attended and the expiry date - Badging registration system collecting logs from the magnetic badge readers installed throughout the EFSA premises: at the main building entrance, at all entry points from outside and between common spaces and office spaces in the EFSA building, including car parks, lifts, stair cases and access doors to meeting rooms. 	

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"/>
<ul style="list-style-type: none"> - EFSA Security Officer and staff of CORSER Unit ; - IVRI security guards on duty at EFSA with 24/7 permanence ; - In the exceptional situation that an administrative inquiry or disciplinary proceeding is 	

opened against a staff member on which fact the person shall be notified, badging data may be made available to the investigation panel or disciplinary board in case these are relevant for the investigation or disciplinary proceeding in question ;
- Personal data may be transferred to bodies in charge of a monitoring, auditing or inspection task in accordance with European Union legislation, such as the European Anti-Fraud Office (OLAF), the EC internal audit service, the EU Court of Auditors, as well as to the EU Ombudsman, the European Data Protection Supervisor.

8) Transfers to recipients outside the EEA (Article 31.1 (e))

Data are transferred to third country recipients:

Yes No

If yes, specify to which third country:

If yes, 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))

How is the data stored?

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

Please provide some general information on the security measures applied:

The badge registration system is a dedicated database with access on need-to-know basis to the Security Officer (CORSER) and nominated IVRI guards.

10) Retention period (Article 4.1 (e))

- EFSA reception registers of visitors and persons with ad hoc presence at EFSA premises are kept for one year
- Logs from the magnetic badge readers (badging data) are stored in the registration system for a period of two months. The retention period of the badging data may be prolonged in the context of an administrative inquiry or disciplinary proceeding.

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.

At any time, data subjects can check which of their personal data EFSA has kept or to rectify data by contacting the Security Officer (SO).

No availability of a specific privacy statement with information to data subjects so far.

Last update of this record: 27/02/2020

Reference: DPO/GOV/7