



NOTIFICATION FORM

FOR DATA PROCESSING OPERATIONS

Date of registration: 25.11.2011

Register No: IT8

1. Name of the data processing operation

Business Continuity Planning (BCP) – list of mobile phone numbers and next of kin contact details

2. Data Controller

Programme or Group:	OSE2 /Helpdesk
Function:	Head of Group OSE2
Contact person:	Örjan Lindberg; Helpdesk helpdesk@eea.europa.eu

3. Description of the processing operation

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

Business continuity planning (BCP) list of mobile phone numbers and next of kin contact details of all staff and consultants. Mobile phone numbers are necessary for urgent information by bulk SMS in a BCP crisis. Next of kin contact details might need to be used in a BCP crisis if a person is harmed or missing.

Personal data are collected and further processed for the purpose of communication in a severe business continuity crisis (e.g. loss of building).

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

☒ Manual processing	Personal data is processed manually only in case of a severe BCP crisis.
☒ Automated processing	The contact details list is automatically generated.

3.3. Are the Personal data processed by an entity external to EEA ('processor')	
☐	Yes
☒	No

4. Lawfulness and purpose of the processing
4.1. Legal basis
The processing operation of a BCP contact list is necessary to guarantee the continuity of the performance and the support of the numerous tasks carried out by the EEA as mandated by Regulation (EC) No 401/2009, and in particular Article 2 thereof; implementing Regulation (EC) No 401/2009 calls for a modern and efficient communication infrastructure including equivalent office automation technology. Furthermore, the European Code of good administrative behaviour, applicable to EEA pursuant to a Decision of its Management Board adopted on 22.6.2004, calls on the institutions, bodies and agencies of the European Union to have the support of an open, efficient and independent administration in carrying out their missions.
4.2. Grounds for lawfulness
The data processing is considered lawful because: ○ it is necessary for the performance of a task carried out in the public interest on the basis of Regulation (EC) No 401/2009 or in the legitimate exercise of official authority vested in the EEA (Article 5(a) of Regulation (EC) No 45/2001); ○ the data subject has unambiguously given his or her consent (Article 5(d) of Regulation (EC) No 45/2001); ○ it is necessary to protect the vital interests of the data subject (Article 5(e) of Regulation (EC) No 45/2001).
4.3. Purpose of the processing
To contact staff members in a BCP crisis when other communication means are unavailable.

5. Features of the processing operation
5.1. Categories of data subjects concerned
All EEA staff members, contracted consultants and guest scientists
5.2. Categories of data
☒ Mobile phone numbers; contact details of next of kin.

6. Retention practice of personal data
Personal data are kept for a maximum period of 1 week after the end of the contract. No personal data is processed for historical or statistical purposes

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

Purpose	Categories of data	Storage media
☐ Historical	Not applicable	☐ Anonymous ☐ Encrypted
☐ Statistical	Not applicable	☐ Anonymous ☐ Encrypted
☐ Scientific	Not applicable	☐ Anonymous ☐ Encrypted

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

Permission for access to the personal data is only granted in a BCP crisis to selected members of the BCP / Incident response Team

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

☐ Yes ☒ No transfer of personal data to third countries or international organisation

9.1. Categories of data

List of mobile phone numbers without names

9.2. Categories of recipients

International SMS service provider

9.3 Purpose of the transfer

Bulk SMS in a BCP crisis

9.4 Modalities of the transfer

Automated export of phone number list without names to SMS service provider. SMS service only used for bulk SMS in a BCP crisis.

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

Staff members received the following information on the intranet site where they can enter their data:

"The only purpose of this contact list is to guarantee communication with staff in the case of a business continuity incident, as described in the business continuity plan (BCP). The contact list complies with the rules set in Regulation (EC) No 45/2001 on data protection and is only accessible for selected BCP / Incident Response Team members when a BCP crisis is declared by the BCP team. Participation in this contact list is voluntary."

The mobile phone numbers would be used in a BCP crisis to send an automatic bulk SMS to all staff with important information, e.g. that the premises are closed the next day. The contact list of the next of kin (closest family member, partner, or friend) might be used in a BCP crisis if a staff member comes to harm or is unaccounted for. These two lists are completely separated from the HR files so please remember to inform HR about any changes in your contact details."

See also the privacy statement available on the intranet (attached as annex 1 to this notification)

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 direct access to their personal data. The measure is voluntary and each staff member has the possibility to fill in, edit or delete their BCP contact details directly on the intranet site.

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

Categories of data	Blocking	Erasure
Any data asked for	Usually immediately and at maximum within 5 working days	Usually immediately and at maximum within 5 working days