



NOTIFICATION

FOR DATA PROCESSING OPERATIONS

Date of registration: 28.6.2011

Register No: IT7

1. Name of the data processing operation

EEA Telephony system

2. Data Controller

Programme or Group:	OSE2 /Helpdesk
Function:	Head of OSE Programme
Contact person:	Sigfús Bjarnason; Helpdesk helpdesk@eea.europa.eu

3. Description of the processing operation

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

The telephone system exchange is a hosted service from the EEA's telephone service provider. Personal data are collected and further processed for the purpose of the management of access rights and delivery of the services (phone numbers, names and statistics).

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	User related data is entered manually.
<input checked="" type="checkbox"/> Automated processing	Traffic data is automatically generated.

3.3. Are the Personal data processed by an entity external to EEA ('processor')

<input checked="" type="checkbox"/>	Yes, the telephony service provider is managing the calls and the telephone exchange.
<input type="checkbox"/>	No

4. Lawfulness and purpose of the processing

4.1. Legal basis

The processing operation of the EEA telephony system 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, and in particular Article 2 thereof; implementing Regulation (EC) No 401/2009 calls for a modern and efficient communication infrastructure.

As almost all institutional tasks have multiple communication aspects, which, considering the current state of the art in use in almost every organisation in a global networked environment in Europe and the world, require that these tasks be supported by the appropriate functionalities of a modern telephone system.

The processing operation of the EEA telephony system is also in line with the requirements set in the European Code of Good Administrative Behaviour, and in particular Articles 12 and 22 thereof.

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); and the data subject has unambiguously given his or her consent (Article 5(d) of Regulation (EC) No 45/2001).

4.3. Purpose of the processing

To enable voice communication amongst EEA staff members and with external partners of the EEA; and to manage and operate the system efficiently and overview invoicing data.

5. Features of the processing operation

5.1. Categories of data subjects concerned

All EEA staff members, contracted consultants and any external party making or receiving calls to or from EEA.

5.2. Categories of data

5.2.1. Data processed in the context of internal telecommunications networks

<input checked="" type="checkbox"/>	Traffic data
<input checked="" type="checkbox"/>	Billing data
<input checked="" type="checkbox"/>	Directories
<input type="checkbox"/>	Others

5.2.2. Other categories of data

<input checked="" type="checkbox"/>	Name, surname, phone number, address (building, floor, office No); Concerning call records: calling number, called number, country, date and time of the call,
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	duration of the call, cost.
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6. Retention practice of personal data

- Data (name, surname, phone No, office address) that are necessary for the operation of the telephone system are kept and used as long as the data subject is the “owner” of the phone number and uses EEA phone services;
- Data concerning calls of the current month + 6 previous month are kept live;
- Data are saved during one year in the Data Centre to allow the good management of the telephone network: production of statistics, invoices verification, consumption follow-up, consultation of the history for technical reasons, inquiries, etc...
- In accordance with the requirements set by the Financial Regulation, data related to payment of invoices are kept for 5 years from the date when discharge is granted for the budgetary year to which the invoices relate.

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

Purpose	Categories of data	Storage media
<input type="checkbox"/> Historical	Not applicable	<input 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

All EEA staff members (officials, temporary agents, contract agents and seconded national experts) and contracted consultants. Data subjects can read on the telephone set display the name or the telephone number of the calling party during calls.

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

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No transfer of personal data to third countries or international organisation
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10. Information given to the data subjects as described in Articles 11 & 12 of the Regulation (EC) No 45/2001

See the European Code of Good Administrative Behaviour, and in particular Article 12 thereof, adopted by EEA on 22.6.2004 and available at the following address: <http://www.ombudsman.europa.eu/en/resources/code.faces>

See also EEA telephony policies on private use of EEA telephones and mobiles phones available

on EEA intranet under work practicalities, IT policies, and reproduced 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 full control over the phone calls he/she receives. Data subjects do not have a direct access to their personal data, but they can report problems and ask questions to the Helpdesk. As for incorrect data encoded in the phone book, data subjects may contact directly the mail administrator who can make the requested changes.

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

Categories of data	Blocking	Erasure
Any data asked for	Within 5 working days maximum	Within 5 working days maximum