



NOTIFICATION FORM

FOR DATA PROCESSING OPERATIONS

Date of registration: 28.6.2011

Register No: MGMT1

1. Name of the data processing operation

Internal audit process from the IAC (Internal Audit Capability)

2. Data Controller

Programme or Group:	EDO 0
Function:	Internal auditor from the IAC
Contact person:	Anne-Marie Buttolo, Anne-Marie.Buttolo@eea.europa.eu

3. Description of the processing operation

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

The internal auditor from the IAC is responsible for giving independent and objective opinions on the adequacy and reliability of internal control systems in place, and for making recommendations with the aim to improve the economy, efficiency and effectiveness of the Agency's activities.

The internal auditor from the IAC is as well assisting the ED (Executive Director) and the management of EEA in controlling risks and ensuring compliance with the applicable legislation and rules.

3.2. Modalities for the processing operation

☒ Manual processing	In the course of the audit work, the internal auditor from the IAC has access to all data held by the Agency and can request access to data held by third parties who have contractual relations with the Agency. Some of this data may be covered by Art.27§2a of the regulation.
☐ Automated processing	

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

☐	Yes
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☒	No
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4. Lawfulness and purpose of the processing
4.1. Legal basis
Audit charter for the IAC; EEA Financial Regulation (Decision EEA/MB/52/15 – written procedure) of 19.12.2008 and in particular art.38a; SEC(2000)1803; International Standards for the professional practice of internal auditing (IIA standards), Council regulation 1700/2003.
4.2. Grounds for lawfulness
The audit charter gives the internal auditor from the IAC full, free and unrestricted access to all information required to perform her duties. This unlimited access to data is carried out in the framework of art. 20§1 of Regulation (EC) No 45/2001, where the internal auditor needs exemptions from the requirement to ask the data subject in advance for permission to acquire personal data and to allow rights of inspection. Considering the legal basis the processing is necessary and lawful under Art.5(a)(b) of Regulation (EC) No 45/2001
4.3. Purpose of the processing
The internal auditor from the IAC is responsible for giving independent and objective opinions on the adequacy and reliability of internal control systems in place, and for making recommendations with the aim to improve the economy, efficiency and effectiveness of the Agency's activities. The internal auditor of the IAC assists as well the ED and the management of EEA in controlling risks and ensuring compliance with the applicable legislation and rules. For each audit assignment, an audit report is addressed to the ED presenting the conclusions and recommendations. The management's response and action plan considered further to the audit findings is included in the report. The internal auditor of the IAC monitors as appropriate the follow-up of audit findings and recommendations. The internal auditor of the IAC shall report on the performance of her duties in the form of an annual activity report to the ED.

5. Features of the processing operation
5.1. Categories of data subjects concerned
EEA seconded officials, temporary agents, and contractual agents, seconded national experts; as well as the persons who are in contact with the EEA in the framework of its activities (applicants, beneficiaries, contractors, experts, visitors, colleagues from another European institution or body, interim staff, etc...)
5.2. Categories of data
Data whose processing is likely to present specific risks and is subject to prior checking by the EDPS

☒	Data relating to suspected offences, offences, criminal convictions or security measures
☒	Data relating to the evaluation of personal aspects of the data subject (e.g. abilities, efficiency and conduct)
☒	Data concerning linkages (not provided for by national or Community legislation) between data processed for different purposes
☒	Data relating to the exclusion of individuals from a right, benefit or contract
Data processed in the context of internal telecommunications networks	
☒	Traffic data
☒	Billing data
☒	Directories
Other categories of data	
☒	The types of data collected in the frame of audits can be data related to staff members (name, personal number, missions, training...) and personal data of applicants and tenderers, their staff and subcontractors collected in the course of grant agreement and procurement processes.

6. Retention practice of personal data

The supporting documentation of the audit findings including personal data are to be retained by the IAC for a period of 5 years following the endorsement of the audit report by the ED. This is justified by the fact that according to the international auditing standards, external assessments of the IAC must be conducted at least once every 5 years by a qualified independent reviewer or review team from outside the organisation to assess its performance.

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

Purpose	Categories of data	Storage media
☒ Historical	The audit reports are kept indefinitely. This type of document is considered to be a document of administrative value as defined in art.1 of Council Regulation 1700/2003 setting out the categories of documents which would be placed in the historical archives of the European Union.	☒ 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

All recipients are on a "need to know" basis:

- the auditees, the EEA Executive Director
- Staff of OLAF, IAS (Internal Audit Service), COA (Court of Auditors),
- The qualified independent reviewer or review team of the IAC work (according to the international auditing standards), from outside the organisation.

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*)

The audit charter for the IAC contains a specific provision on data protection:

"Documents and information collected by the Internal Auditor will be treated with appropriate confidentiality and discretion, in the respect of regulation 45/2001 of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data. Access to data for the Internal Auditor is within the scope of Article 7.1 of the above mentioned regulation:

"1. Personal data shall only be transferred within or to other Community institutions or bodies if the data are necessary for the legitimate performance of tasks covered by the competence of the recipient."

The current notification form for data processing operations is placed on the intranet under the section related to the IAC work.

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*)

Not applicable as the data subject has no rights to consult the data held on her/him in accordance with art.20§1 of Regulation (EC) No 45/2001.

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

Not applicable as the data subject has no rights to consult the data held on her/him in accordance with art.20§1 of Regulation (EC) No 45/2001.

Categories of data	Blocking	Erasure
Not applicable	Not applicable	Not applicable