RECORD OF PROCESSING OPERATION[1] ON

ARES (Advanced Records System), document management system

Nr.	Item	Description
1.0	Last update of this record	11.6.2019
1.1	Reference number	DP.IT.18.1_ARES
1.2	Name and contact details of controller	Philipp Wilhelm Document management Helpdesk@eea.europa.eu
1.3	Name and contact details of joint controller(s) (where applicable)	ARES is run by EC DG DIGIT. The settings for security, access restriction and retention list management in the system are designed by the EC Secretariat-General e-Domec team.
1.4	Name and contact details of the processor (where applicable)	European Commission Directorate-General DIGIT DIGIT-ARES-SUPPORT@ec.europa.eu
1.5	Name and contact details of the DPO	DPO@eea.europa.eu
1.6	Purpose of the processing	EEA is obliged by the Internal Control Framework (Decision EEA/MB/2017/021 of 6.12.2017) and its Financial Regulation (Decision 005/EEA/MB-WP-ADM(FinReg)2014 of 23.4.2014 currently under revision) to run a document management system that stores official documents for a specified period, with a view to improve the quality of its services, preserves its memory, allows it to account for its activities to its auditing bodies, and allows for transparency towards citizens. Further details can be found in the Document Management Policy available on the EEA intranet. Personal data is therefore processed, if it is necessary to do so, at the following stages of the life cycle of documents and files (non-exhaustive list):

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[1] Record of EEA activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

		- Registration and filing of the appropriate documents, - Assigning documents to functional mailboxes, virtual entities, or staff members for action, information or circulation, including deadline management, - Creation of workflows (e-signatories for outgoing documents and assignment of incoming documents), including approval by Agency's staff, - Elimination of documents, files and/or their metadata in accordance with the Common Reference List (CRL), - Creating an audit trail or operations to guarantee the authenticity and security of the files stored in the repository; - Access based on the 'right to know' principle for staff members to documents and files relating to their tasks, - Accountability of the Agency (to discharge authorities, OLAF, Court of Justice, Court of Auditors, etc.), - Agency communication with its external partners, - Public access to document and transparency towards citizens.
1.7	Description of categories of persons whose data the EEA processes and list of data categories	The personal data collected refers to (a) internally, all persons working at the Agency (statutory and non-statutory staff members, contractors) and (b) externally, potentially any person who sends to, or receives from the Agency a document, which shall be registered in accordance with the applicable rules. The personal data collected can be found in (a) the metadata of documents and files (name, surname and Programme/Group of Agency's staff members; name, surname, country (if possible) and e-mail addresses of persons from outside the Agency); and (b) the content of Agency's documents and files, which may reveal personal data of all kinds. Furthermore, certain files may refer to matters relating to the health of Agency's staff members or of their family (processing of such data is justified based on Article 10(3) of Regulation (EU) 2018/1725); or matters relating to infringements or disciplinary procedures. In such cases, a triple security is applied: at the level of metadata, access to

		documents (markings) and of the files (restricted to the persons and/or groups with the right to know).
1.8	Time limit for keeping the data	All documents in ARES are filed in files that are linked to a category of EEA's specific retention list that was approved by the Director of the EEA and the E-Domec team of the European Commission in May 2018. The EEA's specific retention list is based on the Commission Common Retention List (CRL), which has been notified to the European Data Protection Supervisor (EDPS). The specific retention list is available on EEA intranet.
		The retention period starts counting from the latest registered document once a file is closed.
1.9	Recipients of the data	ARES is an internal tool and not a public register or inter-institutional and/or external database, therefore the data recipients are exclusively persons within the Agency. The default set up of all files in Hermes-Ares-NomCom is transparency inside the agency. If not specified otherwise all staff have access to documents registered in EEA filing plan. Several files with sensitive documents are restricted to a specific group (e.g. HR files to the HRM group). There are also options to restrict access to an individual document by using markings in the registration profile.
		Documents can be shared with ARES users outside the EEA by assigning a task to them.
1.10	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No All data is processed by DG DIGIT.
1.11	General description of security measures (where possible)	DG DIGIT manages the system security and safety.
		Access to the Agency's registered documents and files (including personal data) is protected by means of a login and access rights which may be limited in accordance with the 'need to know' principle and are based on the duties entrusted to access holders. The usernames and passwords are managed by the European Commission's common authentication service EU Login (formerly known as ECAS).
1.12	Measures for providing additional information, including how data subjects may exercise their rights of	Link to the Commission's privacy statement for ARES-NOMCOM EC privacy statement Ares

	access, rectification, data portability (where applicable), etc.	