



EUROPEAN COMMISSION

European Climate, Infrastructure and Environment Executive Agency

RECORD OF PERSONAL DATA PROCESSING ACTIVITY

In accordance with Article 31 of the [Data Protection Regulation for EU's](#)¹ (hereinafter referred to as the Regulation), individuals whose personal data are processed by the European Climate, Infrastructure and Environment Executive Agency (hereinafter referred to as CINEA or Agency) in any context whatsoever are to be protected with regard to the processing of personal data and the Agency has to keep records of their processing activities.

Record No: 2022-02/A4-HR-25
Created on (date): 04/01/2022
Last update (date): 07/03/2022

NAME OF THE PROCESSING ACTIVITY

Processing of personal data in the frame of the Official Directory of CINEA ("Who is who")

GROUND FOR THE RECORD:

- Regularisation of a data processing activity already carried out
- Record of a new data processing activity prior to its implementation
- Change of a data processing activity (e.g.: update of a record).

¹ Regulation (EU) 2018/1725 of 23 October 2018

1. MANDATORY RECORD UNDER ARTICLE 31 OF THE REGULATION²

1.1. Name and contact details of controller

- a. CINEA – Unit A.A4 – HR, IT and Logistics
Chaussée de Wavre, 910,
W910 – Floor 03, Office number 004,
BE – 1049 Brussels.
- b. Head of Unit A.A4 – HR, IT and Logistics
- c. Email: CINEA-A4-SECRETARIAT@ec.europa.eu

1.2. Name and contact details of the Data Protection Officer (DPO)

CINEA DPO - CINEA-DPO@ec.europa.eu

1.3. Name and contact details of joint controller (where applicable)

Not applicable

1.4. Name and contact details of processor (where applicable)

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following the signature of a Service Level Agreement between OPEU CE and CINEA on the use of its services (Ares(2021)7938388 22/12/2021).

1.5. Purpose of the processing

The purpose of this processing operation is to set up a directory of CINEA Staff (“Who is Who”) to promote transparency, enable CINEA staff to find contact persons and inform them on arrivals, departures and internal mobility.

The information related to staff is managed by CINEA as follows:

- The data are extracted from different sources, namely from the monthly HR announcement that is made to all staff on the staff arrivals and departures but also from the resumes we receive from the newly recruited agents.
- The data are inserted in the CINEA website and this information will update the organisational chart of the Agency and consequently also the section on the staff arrivals, departures and internal mobility of the CINEA repertory “Who is Who”.

² This part of the record will be published on CINEA website and should be aligned with the information provided in the DP notice

1.6. Legal basis for the processing

Lawfulness: Article 5. 1 (a) of the Regulation: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body;

The legal basis references which apply to the selection are contained in:

- Council Regulation (EC) No 58/2003 of 19 December 2002 laying down the statute for executive agencies to be entrusted with certain tasks in the management of Community programs³;
- Commission Implementing Decision (EU) 2021/173 of 12 February 2021 establishing the European Climate, Infrastructure and Environment Executive Agency, ... and repealing Implementing Decisions 2013/801/EU⁴;
- Commission Decision C(2021)947 of 12 February 2021 delegating powers to the European Climate, Infrastructure and Environment Executive Agency with a view to the performance of tasks linked to the implementation of Union programmes in the field of transport and energy infrastructure; climate, energy and mobility research and innovation; environment, nature and biodiversity; transition to low-carbon technologies; and maritime and fisheries;
- Staff Regulations of officials and the Conditions of Employment of other servants of the European Union;
- Conditions of Employment of Other Servants of the European Union (CEOS).

1.7. Categories of data subjects

All statutory staff members (temporary and contract agents) who are recruited by the Agency, bluebook trainees, intérimaires and intra-muros consultants are also concerned by this process.

1.8. Categories of personal data

Identity related data: name, surname, job title, nationality, spoken languages, picture (uploaded by the staff concerned or taken by the Agency photograph on a free will), office number and contact details such as phone number, email address, etc.

1.9. Retention time (time limit for keeping the personal data)

[a) Retention period:

Data in the “Who’s Who” is kept as long as the data subjects are in service in CINEA and is removed afterwards.

When the HR Unit uses data from the “Who is Who” for processing such as for instance to inform staff on HR changes via emails, data is retained as follows:

- For staff arrivals & departures: 6 months.
- For internal mobility: 1 year.

³ OJ L11, 16.1.2003, p. 1

⁴ OJ L 50, 15.2.2021, p. 9–28

b) Storage period:

The storage periods are the same as indicated for the retention period in point 1.9 a).

c) Is any further processing for historical, statistical or scientific purposes envisaged, which would go beyond the normal retention period? No

1.10. Recipients of the data

The "Who is Who" Directory is published on the Agency's Intranet and is available to any EU Institutions or bodies which can access to it (e.g. European Commission services, Executive Agencies, etc.)

Within the Agency, the HR staff members have access to the data provided directly by the staff members as needed for the processing. Part of the data is accessible also to colleagues from the IT, logistical and communication team.

Information related to staff may be processed by CINEA in the following areas:

- For staff arrivals: the actors involved in the process are CINEA HR Unit and the Communication sector.
- For staff departures and internal mobility: the actors involved in the process are CINEA HR Unit.

In line with the Service Level Agreements in place, only the necessary information is transferred to services of OPOCE and its relevant staff in charge of the process.

Pursuant to point (13) of Article 3 of the Regulation, public authorities that may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. In this context and if appropriate, access will be given to: the European Commission's Internal Audit Service; the European Ombudsman; the European Court of Justice; the Anti-Fraud Office of the European Commission (OLAF); the European Public Prosecutor Office (EPPO), the European Court of Auditors and/or the European Data Protection Supervisor. Further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

1.11. Transfers of personal data to third countries or international organisations

Not applicable.

1.12. Description of security measures

Electronic data resides on the servers of the European Commission, which abide by strict security measures to protect the security and integrity of electronic assets.

The access to the personal data is protected by the management of the access rights, which are strictly limited to specific user groups. The entitlement is distributed according to the principle of 'the need to know' taking into consideration the function, the job and responsibilities of the applicant for an access right. Consequently, the access rights are continuously updated in accordance with the changes in the assignments of the jobholders.

The login and the passwords are managed by the common certification service of the European Commission. (ECAS-authentication system). CINEA is also bound by Commission Decision 2017/46 of 10/1/17 on the security of communications & information systems in the EC.

1.13. Data Protection Notice

A Data Protection Notice (DPN) relevant to this data processing activity is available on the CINEA Intranet:

<https://cineanet.cinea.cec.eu.int/>