



EUROPEAN COMMISSION

Innovation and Networks Executive Agency

RECORD OF PERSONAL DATA PROCESSING ACTIVITY

In accordance with Article 31 of the [Data Protection Regulation for EUIs](#)¹ (hereinafter referred to as the Regulation), individuals whose personal data are processed by the Innovation and Networks Executive Agency (hereinafter referred to as INEA 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: 2020-005/R-HOR-01
Created on (date): 15/11/2019
Last update (date): 27/3/2020

NAME OF THE PROCESSING ACTIVITY

Internal Control Activities

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).

This record replaces notification HOR-1 issued under the repealed Data Protection Regulation 1045/2001

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

1. MANDATORY RECORD UNDER ARTICLE 31 OF THE REGULATION

1.1. Name and contact details of controller

- a. INEA Department R - Programme Support & Resources
Chaussée de Wavre 910
W910 04/136
BE – 1049 Brussels
- b. Head of Department
- c. Email: Damiao.CHAVES@ec.europa.eu

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

INEA DPO

INEA-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)

Not applicable

1.5. Purpose of the processing

Assessment of the internal control system of INEA in particular for verifying the compliance with a set of targets defined in the Internal Control Framework of the Agency, notably the Internal Control Monitoring indicators. Compliance may not be verified if access to personal data is not granted. This particularly refers to, but not exclusively, access to data of Human Resources nature. The Internal control manager receives mostly lists that allow drawing the bigger picture in relation to a series of aspects that impact the overall internal control system of the Agency. The purpose is not to gather personal data but, by default, in these lists personal data is included.

1.6. Legal basis for the processing

Lawfulness: Article 5.1 (a) (b) of Regulation 2018/1725:

- (a) 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.
- (b) processing is necessary for compliance with a legal obligation to which the controller is subject.

The need for an annual assessment of the presence and effective functioning of internal controls is laid down in Art. 74.9(c) of the Financial Regulation, according to which Authorising Officers by Delegation must report on the 'efficiency and effectiveness of internal control systems, including an overall assessment of the costs and benefits of controls'. Furthermore, the annual assessment of internal controls has traditionally been one of the core characteristics of the Internal Control Frameworks of the European Commission.

The relevant legal basis encompasses:

- 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 programmes;
- Commission Decision 2013/801/EU of 23 December 2013 establishing the Innovation and Networks Executive Agency and repealing Decision 2007/60/EC establishing the Trans-European Transport Network Executive Agency as amended by Decision 2008/593/EC;
- Commission Decision C(2013)9235 of 23 December 2013 delegating powers to INEA with a view to the performance of tasks linked to implementation of the Union programmes in the field of transport, energy, telecommunications infrastructure and in the field of transport and energy research and innovation, comprising in particular implementation of appropriations entered in the general budget of the Union;
- Commission Regulation 1653/2004, of 21 September 2004, on a standard financial regulation for the executive agencies pursuant to Council Regulation 58/2003 laying down the Statute for executive agencies to be entrusted with certain tasks in the management of Community programmes amended by Commission Regulation 1821/2005 and by Commission Regulation 651/2008;
- Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012;
- Commission Decision (EU) 2018/1520 of 9 October 2018 repealing Delegated Regulation (EU) No 1268/2012 on the rules of application of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union.

1.7. Categories of data subjects

All INEA Staff

1.8. Categories of personal data

- First name and last name
- Office address/number
- Telephone number (business)
- e-mail (business)
- Information on the attendance to trainings
- Type of contract
- Duration of contract
- Grade
- Access right to IT tools

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

a) Retention period:

INEA applies the principles and retention periods indicated in Common Retention List of the Commission² by analogy.

Files covering the definition, adoption, application and coordination of the implementation of internal controls are kept for 7 years. Following this period they are transferred to the historical archives.

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

- INEA internal control manager
- Head of Department of risk management and internal control
- The Director of INEA
- Legal team

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

Not applicable

1.12. Description of security measures

Access to data is only possible on a need-to-know basis and for analytical purposes. Data is kept confidential and stored in restricted folders.

Access to data is safeguarded by the internal European Commission IT systems, which protect against external users accessing the data. Access to electronic files is protected via the Commission security measures (use of password & ECAS authentication system, etc).

1.13. Data Protection Notice

A Data Protection Notice (DPN) relevant to this data processing activity is available on the INEA Intranet <https://ineanet.inea.cec.eu.int/emop/internal-control>

² SEC(2019)900/2