



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.

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Record No: 2020-024/R4-HOR-3 Created on (date): 26/2/19
Last update (date): 07/09/2020

NAME OF THE PROCESSING ACTIVITY

INEA Business Continuity Management – communication cascade

GROUND FOR THE RECORD :

- Regularisation of a data processing activity already carried out
This record replaces notification HOR 4 issued under the previous Data Protection Regulation
- 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

² *The Record number in the central register will be provided during the consultation with the DPO*

1. MANDATORY RECORD UNDER ARTICLE 31 OF THE REGULATION³

1.1. Name and contact details of controller

- a. INEA Unit R4
Chaussée de Wavre 910
W910
BE – 1049 Brussels
- b. the Head of Unit R4 (BC Correspondent)
- c. Email: INEA-BCP@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

Business Continuity Management (BCM) helps the Agency to prepare and respond to business disruptions. Timely and efficient communication is a critical element. In the event of a major disruption, the Agency must contact staff quickly, possibly outside normal office hours, in line with INEA's duty of care.

In order to be ready to trigger a communication cascade at any moment, three types of up-to-date records of the private telephone details of all staff are maintained for Business Continuity purposes. as follows:

- An internal cascade list limited to the staff within the Unit, which is used for manual phone calls at Unit level only;
- An electronic Business Continuity Plan (BCP) contact list of all staff members of INEA;
- A hardcopy, which is used in case all electronic communications fail.

The processing is necessary to

- Ensure the staff members security and safety;
- Enable INEA to safeguard continuity of service and to prevent major disruptions of its activities;
- Prepare exercises and respond to crises and operational disruptions affecting the normal functioning of INEA

³ *This part of the record will be published on INEA website and should be aligned with the information provided in the DP notice*

Staff occupying critical or essential functions would need to be informed about the problem so that they could fulfil the roles foreseen in Agency's crisis response and business continuity plans (BCP's), whilst other staff would need to be informed of the problem and of what they should do.

1.6. Legal basis for the processing

- Council Regulation 58/2003 of 19 December 2002, laying down the Statute for executive agencies to be entrusted with certain tasks in the management of EU programmes;
- Regulation (EC) n° 1653/2004 of 21 September 2004 on a standard Financial Regulation for the executive agencies pursuant to Council Regulation (EC) n° 58/2003 of 19 December 2002 laying down the statute for executive agencies to be entrusted with certain tasks in the management of Community programme;
- 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
- Communication to the Commission from the President in agreement with Mr Kallas - Framework for Business Continuity Management in the Commission (SEC/2006/899)
- Staff Regulations of Officials of the European Communities as fixed by regulation (CEE, Euratom, CECA) n° 259/68 of the Council :
- Article 55: this provision states that "officials in active employment shall at all time be at the disposal of their institution".
- Conditions of employment of other servants of the European Communities :
- Article 16 and 91 states that the article 55 of the Staff Regulations shall apply by analogy.
- **Grounds for lawfulness of the Regulation :**
 - Article 5(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;
 - Article 5 (e) processing is necessary in order to protect the vital interests of the data subjects or of another natural person.

1.7. Categories of data subjects

All INEA staff including statutory employees, trainees, interims and consultants.

1.8. Categories of personal data

- First name and last name
- Private phone number (for Business Continuity Plan (BCP) contact list stored in the BCP bag and internal unit cascade)
- Private email address (only for electronic Business Continuity Plan (BCP) contact list stored in the BCP bag)

Data are collected by:

- INEA HR team, at the start of recruitment, with consent of the staff member in SYSPER
- by unit secretaries from the data subject in person for the internal cascade within the unit. Staff who do not consent are not taken into this cascade

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

- a) Retention period: As long as the data subject is employed in INEA and will be removed afterwards

- b) Storage period: As long as the data subject is employed in INEA
- 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

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

- INEA BCP team (BC correspondent, BC desk officer, BC secretariat)
- INEA Duty officers (when on duty)
- INEA BCP Crisis management team (in case of BCP event)
- INEA Head of units and line managers (and their back-ups)
- INEA unit secretaries (compiling unit cascade lists)

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

Not applicable

1.12. Description of security measures

Personal data is stored electronically and in paper and accessible only by the authorized personnel for the purposes of the processing on a need to know basis. Access is granted only if there is a clearly specified administrative purpose, and only to those whose role and level of responsibility require them to have access. Staff having access to the data is bound by confidentiality as provided for by the Staff Regulations.

The hardcopy is kept in the BCP bag, which is only accessible to the Duty Officer on duty during normal operations, and available to all recipients when a BCP event is launched.

The electronic BCP contact list is stored electronically on a secure file server location, only accessible to the INEA BCP team.

The internal cascade list is limited to the staff within the Unit and is also safely stored by the unit secretariat in electronic format in a folder accessible only on a need to know basis.

The access to the personal data in electronic formats is protected by the management of the access rights which are strictly limited to the specific relevant user groups. The login and the passwords are protected via an authentication system. Commission Decision 2017/46 of 10/1/17 on the security of communications & information systems in the EC applies also to the Agency.

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/>).