



## EUROPEAN COMMISSION

European Climate, Infrastructure and Environment Executive Agency (CINEA)

### RECORD OF PERSONAL DATA PROCESSING ACTIVITY

*In accordance with Article 31 of the [Data Protection Regulation for EUIs](#)<sup>1</sup> (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 4-2019-HR -22  
 Created on (date): 17/10/19  
 Last update (date): 26/08/21

#### NAME OF THE PROCESSING ACTIVITY

Social Events for staff managed by HR

#### 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).

<sup>1</sup> Regulation (EU) 2018/1725 of 23 October 2018

## 1. MANDATORY RECORD UNDER ARTICLE 31 OF THE REGULATION<sup>2</sup>

### 1.1. Name and contact details of controller

- a. CINEA.A4  
Chaussée de Wavre 910  
W910 03/004  
BE – 1049 Brussels
- b. Head of Unit CINEA.A4
- c. Email: CINEA-HR-RECRUITMENT@ec.europa.eu

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

CINEA DPO

[CINEA-DPO@ec.europa.eu](mailto: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)

Not applicable

### 1.5. Purpose of the processing

The purpose of the processing is to collect personal data needed strictly for the organisation of social events (e.g. Halloween party, Xmas party, Away Day/team building etc) organised by the HR sector of CINEA. The processed personal data concerns the active staff of CINEA and, for certain events (e.g. St Nicolas party) their families (e.g. children etc.).

The processing is done within the framework of Multi-Annual Human Resources Strategy 2016-2020 to increase well-being at work and foster communication among staff members.

### 1.6. Legal basis for the processing

*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<sup>3</sup>;*

*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/EU<sup>4</sup>;*

*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; Article 9 and Article 1 of Annex II of the Staff Regulations;*

Multi-Annual Human Resources Strategy 2016-2020 and subsequent strategies.

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<sup>3</sup> OJ L11, 16.1.2003, p. 1

<sup>4</sup> OJ L 50, 15.2.2021, p. 9–28

### 1.7. Categories of data subjects

- (a) CINEA Temporary agents and Contractual agents in active employment;
- (b) All external staff members working in CINEA (Trainees, Consultant, Interim staff);
- (c) Spouses of the persons specified in section (a) and (b);
- (d) Children of the persons specified in section (a) and (b);

### 1.8. Categories of personal data

- **Identification data:** name, staff number, link to staff member (if family members are taking part in the social event (e.g. St Nicolas party)) ;
- **Other relevant information** for the organisation of the event: age of the children & dietary preferences.
- Pictures may be taken during the event by the Communication Team on a free will of the staff members & upon prior request (see relevant data protection record for communication for more information)

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

a) Retention period:

CINEA applies the principles and retention periods indicated in Common Retention List of the Commission<sup>5</sup> (CRL) by analogy.

Personal data are kept for the time necessary to fulfil the purpose of collection or further processing. List of participants are deleted or destroyed right after that the event took place.

The maximum retention period in accordance with CRL, which may apply is 4 years<sup>6</sup>

b) Storage period: same as above (see 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

Access to the personal data is provided to the authorised CINEA staff in HR sector and on a need to know basis solely.

In certain cases, due to logistics and security, the security officers at the building entrance may be provided with the list of participants' name only for the duration of the event.

Contractors hired by CINEA to organise/ animate the event do not access to any personal data and are only involved in the logistical or organisational aspects.

As regards the enrolment of staff children to St Nicolas' gifts, the inscription list is available on a shared point for the duration needed to select the gifts on a voluntary

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<sup>5</sup> ARES(2019)2627677 – 15/04/2019

<sup>6</sup> According to CRL files linked to day-to-day HR management have and administrative retention period of 4 years.

basis and staff members are free to exercise their full data protection rights (restriction, limitation, etc).

In addition, data may be disclosed public authorities, which are not regarded as recipient but may receive personal data in the frame of a particular inquiry in accordance with Union and Member State law, namely:

- The European Court of Justice or a national judge as well as the lawyers and the agents of the parties in case of a legal procedure;
- The competent Appointing Authority in case of a request or a complaint lodged under Articles 90 of the Staff Regulations;
- IDOC in line with Commission Decision of 12 June 2019 laying down general implementing provisions on the conduct of administrative inquiries and disciplinary proceedings - C(2019)4231 and Commission Decision (EU) 2019/165 of 1 February 2019 Internal rules concerning the provision of information to data subjects and the restriction of certain of their data protections rights in the context of administrative inquiries, pre-disciplinary, disciplinary and suspension proceedings;
- OLAF in case of an investigation conducted in application of Regulation (EC) No 1073/1999;
- The Internal Audit Service of the Commission within the scope of the tasks entrusted by article 118 of the Financial Regulation and by article 49 of the Regulation (EC) No 1653/2004;
- The Court of Auditors within the tasks entrusted to it by Article 287 of the Treaty on the Functioning of the European Union of the EC Treaty and Article 20, paragraph 5 of Regulation (EC) No 58/2003;
- The European Ombudsman within the scope of the tasks entrusted to it by Article 228 of the Treaty on the Functioning of the European Union;
- The European Data Protection supervisor in accordance with Article 58 of the Regulation (EC) 2018/1725;
- The European Public Prosecutor's Office within the scope of Article 4 of Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office;

The transmission will be restricted to the information necessary for the competent entity to carry out its task.

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

Not applicable

#### **1.12. Description of security measures**

All data in electronic format (e-mails, documents, ...) are stored on a secured HR drive with restricted access on a need to know basis by the relevant HR officers in CINEA, who are bound by confidentiality rules. 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 (through User-ID and password, etc).

The use of paper files is very limited & for the duration of the event only (e.g. participants lists transmitted to the security officer at the building entrance, etc). These paper files are then destroyed after the event.

### **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/services/human-resources/legal-issues/data-protection>