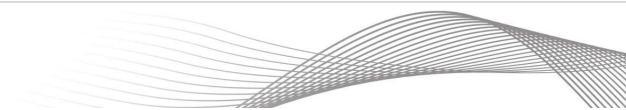


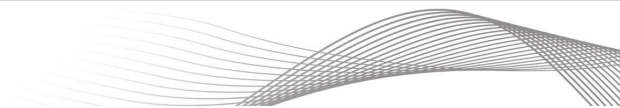
## EDPS record of processing activity

Record of EDPS 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.

Nr.	Item	Description
		<b>Access to building for staff during covid-19 pandemic</b>
1.	Last update of this record	<b>15/09/2021</b>
2.	Reference number	<b>52</b>
3.	Name and contact details of controller	<a href="#">European Data Protection Supervisor (EDPS)</a> <b>Postal address:</b> Rue Wiertz 60, B-1047 Brussels <b>Office address:</b> Rue Montoyer 30, B-1000 Brussels <b>Telephone:</b> +32 2 283 19 00 <b>Email:</b> <a href="mailto:edps@edps.europa.eu">edps@edps.europa.eu</a>  Responsible department or role: <a href="mailto:edps-lso@edps.europa.eu">edps-lso@edps.europa.eu</a>  Contact form for enquiries on processing of personal data to be preferably used: <a href="https://edps.europa.eu/node/759">https://edps.europa.eu/node/759</a>
4.	Name and contact details of DPO	<a href="mailto:dpo@edps.europa.eu">dpo@edps.europa.eu</a>
5.	Name and contact details of joint controller (where applicable)	N/A



Nr.	Item	Description
6.	Name and contact details of processor (where applicable)	N/A
7.	Short description and purpose of the processing	<p>The EDPS has set up a procedure in order to establish access to its building during the Covid-19 pandemic. The aim of this procedure is to curb the spread of COVID-19 virus (for example, as a result of crowded places and meetings).</p> <p>Staff members can enter the building only based on prior weekly authorisation of their respective line manager. Staff members are admitted to the building in accordance with a certain threshold (50 per cent of the staff allocated for the entire building, maximum 60 per cent per each floor), monitored by assigned 2 HRBA staff members. Access to the building is recorded in an excel table (Z:\Presence in the office)..</p> <p>Personal information is provided by filling up an excel table in a shared drive put at disposal of staff by the HRBA Unit. The authorisation will be given by the line manager on the basis of the obligation of the presences in the office and on the rotation, if multiple presences are planned weekly by different staff members of the same unit. The assigned HRBA staff members will confirm the line manager authorisation by checking that presence thresholds are respected.</p>
8.	Description of categories of persons whose data the EDPS processes and list of data categories	All staff wishing to access MTS premises will have to provide the following data: surname, first name, office, floor, day of presence and possible hours of presence in the office. Sometimes also reasons to go to the office.
9.	Time limit for keeping the data	<p>Personal data will be kept as long as it is necessary to verify presence in the office and possibly apply contact tracing measures and verify reasonable rotation of individuals. The maximum retention period for data in the shared drive is two months from the recording. After this period, the personal data will be anonymised and might be used in an aggregated form (per unit and per floor) for HR possible future policies and joint policies with other EU institutions. Once aggregated, personal data will be deleted.</p> <p>A back up copy will be kept by HRBA in a separate and with restricted access drive with anonymised data older than two months for HR purposes. As soon as a staff member leaves the EDPS, all his/her personal data will be removed without delay.</p>



Nr.	Item	Description
10.	Recipients of the data	<p>The recipients of your personal data will be:</p> <ul style="list-style-type: none"> <li>• Line manager for authorisation and possible manual contact tracing activity</li> <li>• Two persons of the HRBA unit in charge of monitoring the thresholds and possible contact tracing, on a need to know basis and in compliance with the relevant current legislation</li> <li>• the Director as AIPN in charge of overseeing health and safety within the work place</li> <li>• (Incidentally) Other staff from the same unit/floor asking for access for the same day/period</li> </ul>
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No such transfers.
12.	General description of security measures, where possible.	The tables in the drives will be accessible to every staff member for two months. After two months the back up copy with aggregated data per unit and floor will be anonymised and protected by a strict need to know principle (only HRBA officer and the EDPS LSO can have access).
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	Data protection notice available internally

