



DISCUSSION CASE - ARCHIVING AND DATA PROTECTION

THE CONTEXT

The archives services of the *European Accountability Agency* (EAA) are working on a project to digitise the Agency's paper archives as part of the preparations for their transfer to the Historical Archives of the EU in Florence (HAEU).

These archives, referring to the first 10 years of activity of the Agency (1985-1995), have been selected for permanent preservation in accordance with relevant policies and retention schedules; they will be open to the public and transferred to HAEU according to the Archives regulation (and the 30 years rule).

The paper files will be preserved in Florence, whilst the digital copies will be made available through the Agency website (with links to the HAEU website).

The records which will be digitised include:

- Documents on the setting-up and functioning of the agency, such as signed decisions, SLAs, MoUs, organisation charts
- Official correspondence (in-out)
- Speeches by top management
- Minutes of meetings of the top management (both on core business and general administration)
- Pictures of public events with staff/external guests, held to mark milestones or achievements of the organisation

DISCUSSION ITEMS

As the DPO of the EAA, what advice would you give on the following issues?

- Need for a risk assessment and its focus
- Contractual arrangements with the external provider for digitisation
- Online dissemination for digitised material once open to public
- Information of data subjects (in light of derogations)
- How to prepare for potential requests for rectification and erasure (in light of derogations)