

**REGISTER NUMBER: 216**

**NOTIFICATION FOR PRIOR CHECKING**

Date of submission: 21/05/2007

Case number: 2007-325

Institution: European Commission

Legal basis: article 27-5 of the regulation CE 45/2001<sup>(1)</sup>

(1) OJ L 8, 12.01.2001

**INFORMATION TO BE GIVEN<sup>(2)</sup>**

(2) Please attach all necessary backup documents

1/ Name and adress of the controller

2) Name and First Name of the Controller:KOCKEROLS Pierre

3) Title:Head of Unit

4) Directorate, Unit or Service to which the Controller is attached:D.

5) Directorate General to which the Controller is attached:JRC

2/ Organisational parts of the institution or body entrusted with the processing of personal data

26) External Company or Directorate General to which the Processor is attached:

25) External Company or Directorate, Unit or Service to which the Processor is attached:

3/ Name of the processing

DOSIMETRY DATA AT JRC-IRMM IN GEEL.

4/ Purpose or purposes of the processing

In the framework of radioprotection regulation, the local radioprotection sector of JRC- IRMM is obliged to maintain a database with dosis states for people working in radiation fields: statutory staff, external staff and visitors. This in oder to survey individual doses of workers which are occupationnally exposed to ionising radiation.

5/ Description of the category or categories of data subjects

14) Data Subject(s) concerned:

The persons identified as occupationnally exposed to ionising radiation :

- JRC officials
- external staff under contract
- some visitors. (short period)

16) Category(ies) of Data Subjects:

The persons identified as occupationnally exposed to ionising radiation :

- JRC officials
- external staff under contract
- some visitors

6/ Description of the data or categories of data (including, if applicable, special categories of data (article 10) and/or origin of data)(*including, if applicable, special categories of data (article 10) and/or origin of data*)

17) Data field(s) of Data Subjects:

Attention: Please indicate and describe in the answer to this question also data fields which fall under article 10

Name , family name, personal number, date of birth , date started at the JRC, date of departure form the JRC, dosimetry number, radiation category, radiation exposure.

This processing is subjected to Art 10.

18) Category(ies) of data fields of Data Subjects:

Attention: Please indicate and describe in the answer to this question also categories of data fields which fall under article 10

Personal data collected.

This processing is subjected to Art 10.

7/ Information to be given to data subjects

15a) Which kind of communication(s) have you foreseen to inform the Data Subjects as described in articles 11 - 12 under 'Information to be given to the Data Subject'

The annexed Privacy Statement is available for data subjects on the IRMM services website.

8/ Procedures to grant rights of data subjects (rights of access, to rectify, to block, to erase, to object)(*rights of access, to rectify, to block, to erase, to object*)

15b) Which procedure(s) did you put in place to enable Data Subjects to exert their rights: access, verify, correct, etc., their Personal Data as described in articles 13 - 19 under 'Rights of the Data Subject' :

The data subjects can refer directly to the Controller in order to exert their rights.

9/ Automated / Manual processing operation

7) Description of Processing:

Attention: Please describe in the answer to this question if you process personal data falling under article 27 "Prior-Checking (by the EDPS - European Data Protection Supervisor)"

The processing deals with the storage of information related to radioactive doses for people working in radiation fields at the JRC Institute for Reference Materials and Measurements (IRMM) in Geel.

Individual dosimeters are issued to people working in controlled area's": statutory staff, external staff and visitors.

Every month the dosimeters are examined by the University of Liège. After read-out, an excel file is sent by E-mail to the head of the radioprotection sector. Data are then manually transferred into the dosimetry database. In this database also the positive results of excretion samples are stored. In the event that persons were positively irradiated an E-mail is sent to inform them.==> could you precise who is "them"

After a calendar year all results have to be sent by normal mail to the relevant Belgian authorities.

8) Automated Processing operation(s):

Production of a unique reference number linked to a personal name and to the dosimeter.

9) Manual Processing operation(s):

Data are manually transferred into the dosimetry database.

10/ Storage media of data

Both paper and electronic

11/ Legal basis and lawfulness of the processing operation

11) Legal basis of Processing:

European Directives 96/29 and 90/641,

IAEA Basic Safety Standards n° 115.

Belgian legislation ARBIS (Royal Decree of 20/7/2001).

12) Lawfulness of Processing:

Answering this question please also verify and indicate if your processing has to comply with articles 20 "Exemptions and restrictions" and 27 "Prior checking (by the EDPS)"

Art 5(a), 45/2001

This personal data processing falls under Art. 27

12/ The recipients or categories of recipient to whom the data might be disclosed

20) Recipient(s) of the Processing:

Medical & Health Physics Officers responsible in dosimetric assessment.  
Belgian authorities responsible for dose follow-up.

21) Category(ies) of recipients:

Medical service (managed by DG Admin)  
Health Physics service (IRMM SHES sector)  
Belgian Federal Service for labour  
Data transfer follows Art.7 and Art.8.

13/ retention policy of (categories of) personal data

Records are kept in archive for not less than 30 years after the termination of the work or from the last visit date.

13 a/ time limits for blocking and erasure of the different categories of data (on justified legitimate request from the data subject) (Please, specify the time limits for every category, if applicable)  
(on justified legitimate request from the data subject)  
(Please, specify the time limits for every category, if applicable)

22 b) Time limit to block/erase data on justified legitimate request from the data subjects

Following a justified and legitimate request by the Data Subject to the Controller, the personal data will be modified in the database within 2 weekss.

14/ Historical, statistical or scientific purposes

*If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification,*

22 c) Historical, statistical or scientific purposes - If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification

Annual statistics - no names - totally anonymous

15/ Proposed transfers of data to third countries or international organisations

27) Legal foundation of transfer:

Only transfers to third party countries not subject to Directive 95/46/EC (Article 9) should be considered for this question. Please treat transfers to other community institutions and bodies and to member states under question 20.

Not applicable

28) Category(ies) of Personal Data or Personal Data to be transferred:

Not applicable

16/ The processing operation presents specific risk which justifies prior checking (please describe): *(please describe)*:

7) Description of Processing:

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12) Lawfulness of Processing:

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Art 5(a), 45/2001

This personal data processing falls under Art. 27

Article 27.2.(a) Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,

Processing of data relating to health

Article 27.2.(b) Processing operations intended to evaluate personal aspects relating to the data subject,

n/a

Article 27.2.(c) Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

n/a

Article 27.2.(d) Processing operations for the purpose of excluding individuals from a right, benefit or contract,

n/a

Other (general concept in Article 27.1)

n/a

17/ Comments

1) Date of submission:

10) Comments if applicable:

36) Do you publish / distribute / give access to one or more printed and/or electronic directories?

Personal Data contained in printed and/or electronic directories of users and access to such directories shall be limited to what is strictly necessary for the specific purposes of the directory.

If Yes, please explain what is applicable.

no

37) Complementary information to the different questions if applicable, including attachments to this notification which should not be public :

PLACE AND DATE:21/05/2007

DATA PROTECTION OFFICER: RENAUDIERE Philippe

INSTITUTION OR BODY:European Commission