



EUROPEAN DATA PROTECTION SUPERVISOR

The EU's independent data
protection authority



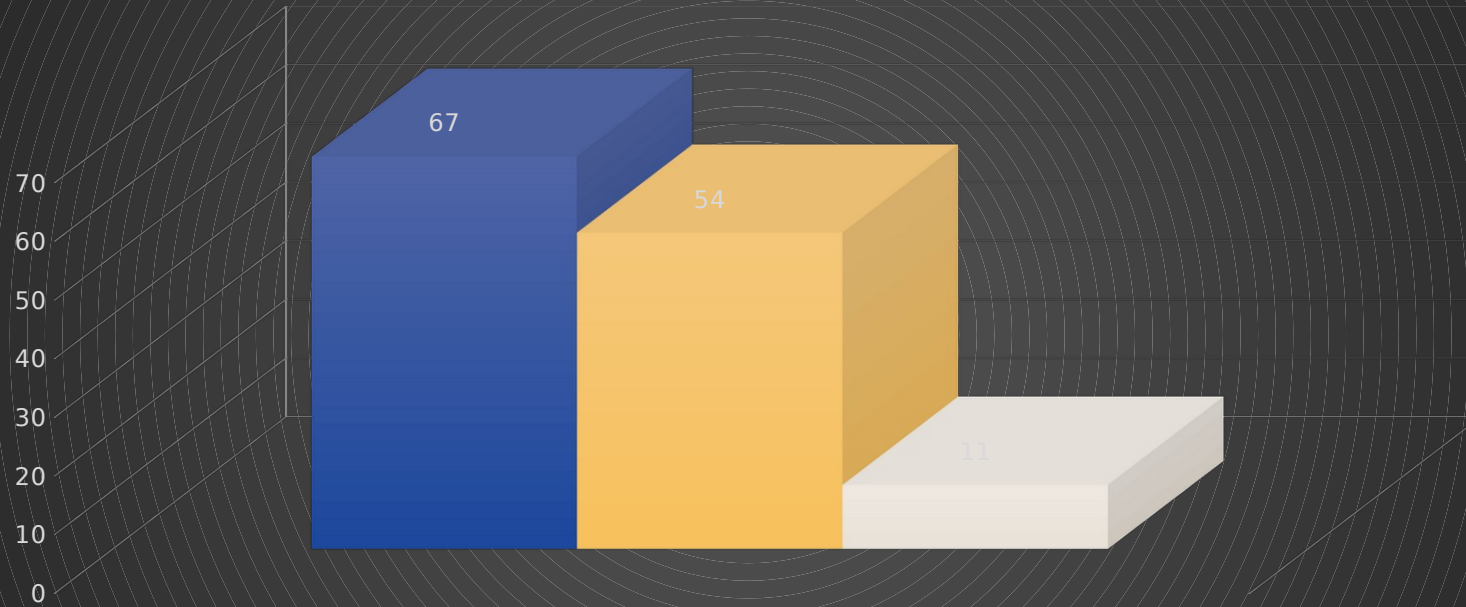
Survey on COVID-19 related processing activities - An Overview

EDPS-DPO meeting 14 December 2021

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- EDPS survey on Covid-19 related processing activities by EU institutions, bodies, offices and agencies
- December 2020
- Why this survey?**
- A number of European institutions, agencies and bodies (EUAs) have implemented new processing activities to help prevent the spread of Covid-19 infection in the context of their return to work strategy. Moreover, in the Covid-19 outbreak, forced every EUAs to transform its data to maintain exclusively its network for most of their staff. The need for workers, finally, ensure data, correct collaboration, audio or videoconferencing or other of their core business missions in public health.
- The survey will focus on these areas:
- new processing operations implemented by EUAs to ensure business continuity in times of emergency (part 2);
 - IT tools or solutions implemented by EUAs to ensure business continuity in times of emergency (part 2);
 - new processing operations implemented or enhanced by EUAs to ensure business continuity in times of emergency (part 2).
- At the end of the survey, EUAs are given the opportunity to bring other matters to the EDPS attention in the context of Covid-19 related data processing operations (Part 4).
- With this survey, the EDPS aims to map the processing activities and tools used by EUAs to ensure business continuity in times of Covid-19 and to gather information as to how EUAs comply with the data protection requirements under Article 6 of the Charter of Fundamental Rights and Regulation 2018/4725 (the Regulation).
- ¹ Regulation (EU) 2018/4725 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 and on the free movement of such data, and on the rules of law, liability and redress in relation to the processing of personal data (GDPR) and Directive (EU) 2018/973 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 and on the free movement of such data, and on the rules of law, liability and redress in relation to the processing of personal data (GDPR).
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Replies

Total EUIs 67 - Replies/Non - Replies



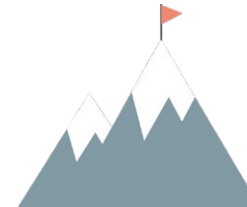
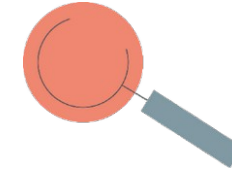
- Total EUIs (The EDPS supervises 69 EUIs but at the time of the survey, two of them were not yet operational and therefore not invited to fill in the survey)
- Total amount of replies (covering 56 EUIs)
- Total amount of non replies





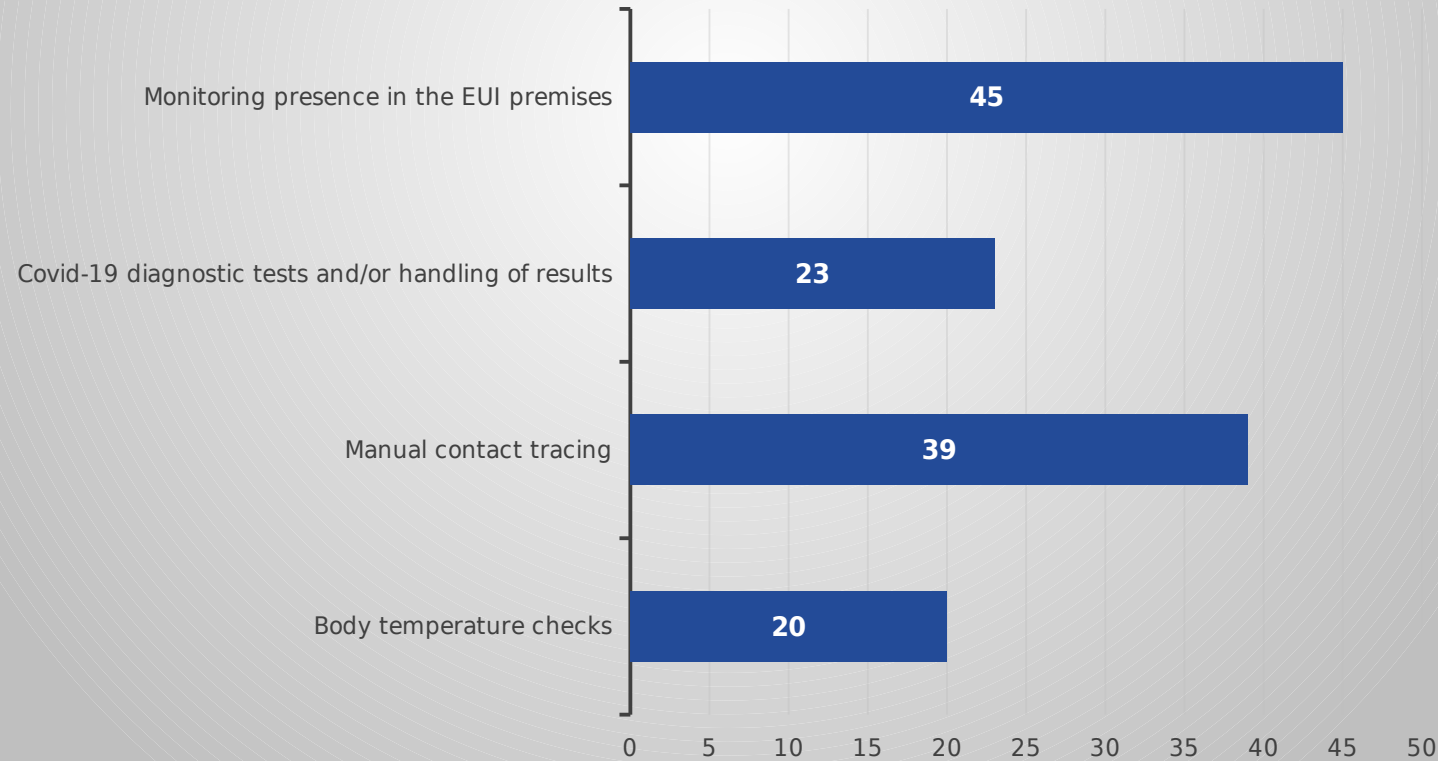
54 replies

- 300 processing operations and IT tools classified and analysed one by one
- Categories
 - Four main new processing operations (pre-defined)
 - Other new processing operations
 - New and modified IT tools
 - (COVID-19 as core business for certain EUIs)



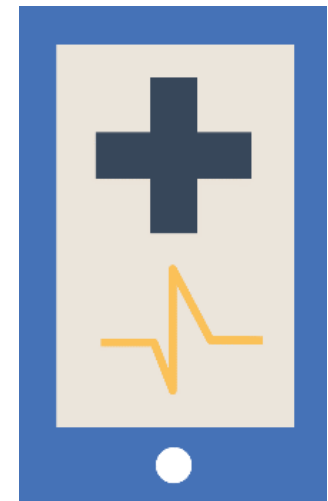
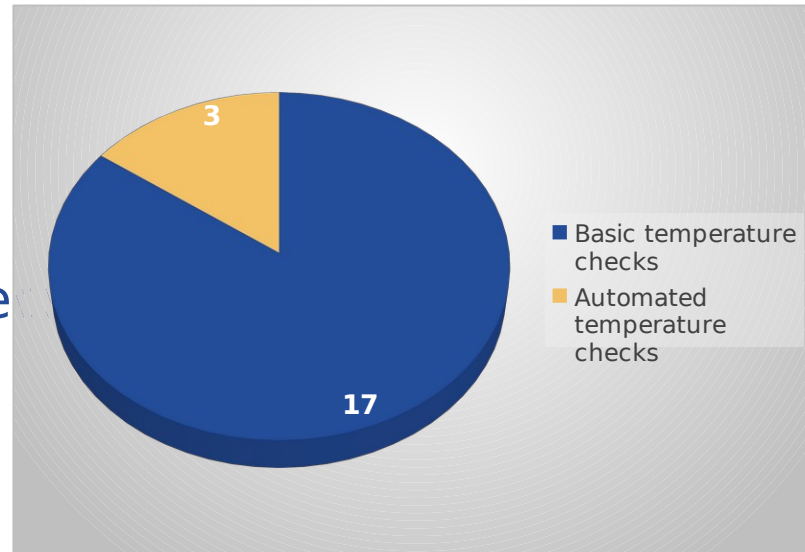
Main new processing operations

Number of EUIs conducting each of the four new processing operations (Total number of replies: 54).

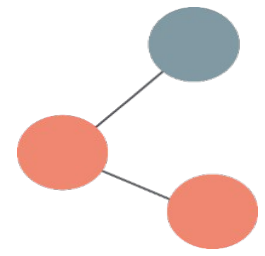


Body temperature checks

- A few results
 - 20 positive replies
 - 3 on automated checks
 - No registration of the checks
 - 2 DPIAs (DPO involved)
- Meaningful human involvement

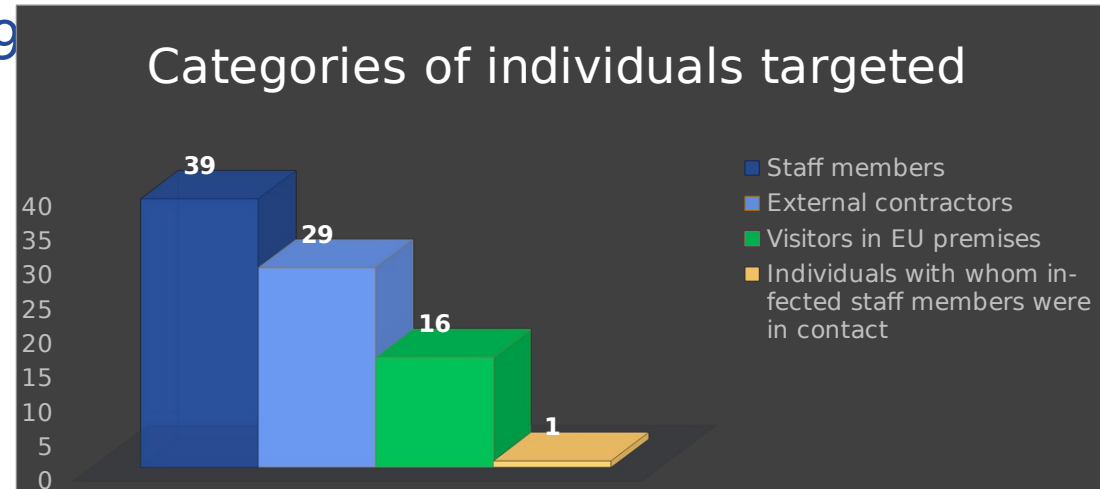


Manual Contact Tracing



➤ A few numbers

- Positive replies: 39
- Mandatory: 19
- Data subjects:

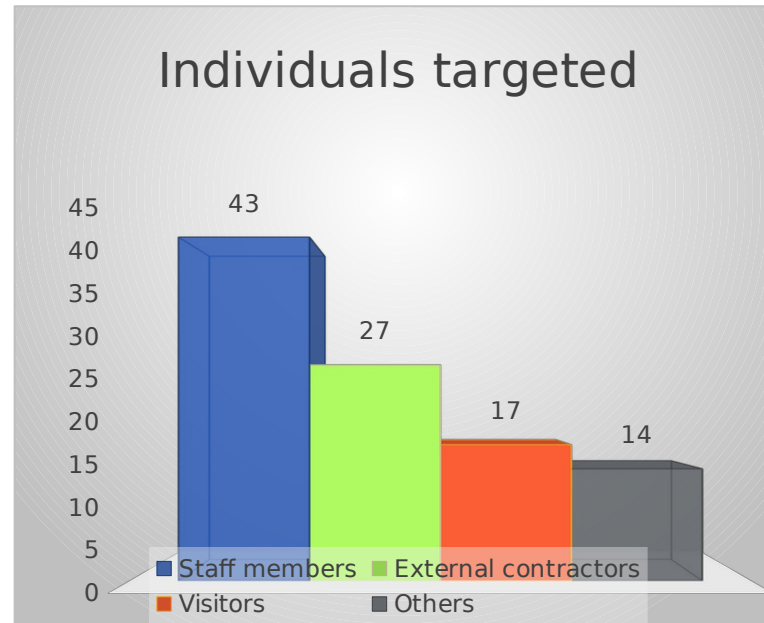
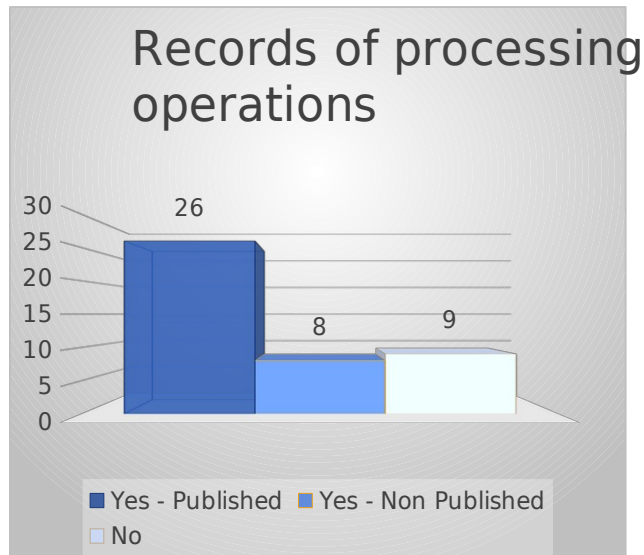


- National health authorities as recipients: 9
- DPIAs (DPO involved in all): 8

➤ Retention

Monitoring presence in EULs' premises

- A few numbers
 - Replies: 45
 - Purpose: occupancy rate (41) and contact tracing (22)
 - Records
 - Individuals

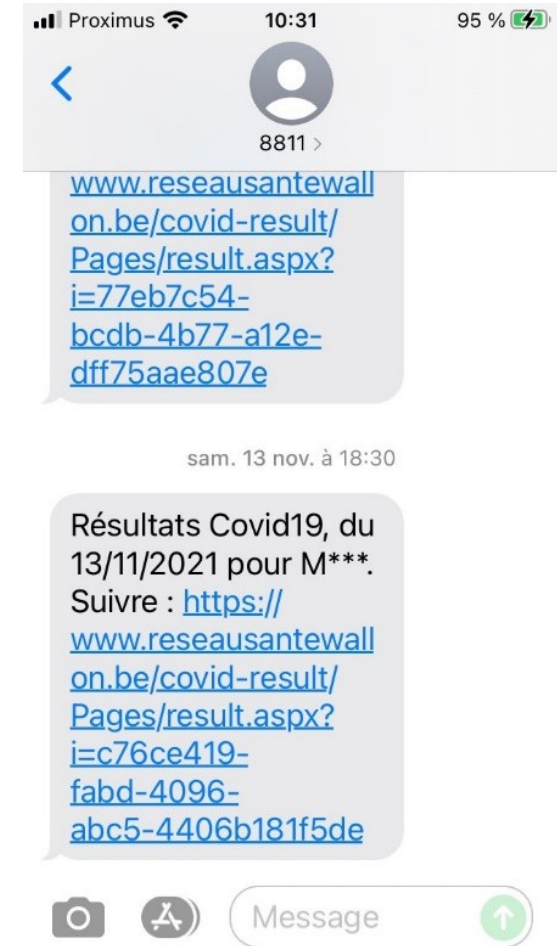


- Ground for lawfulness

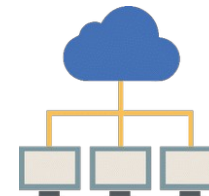
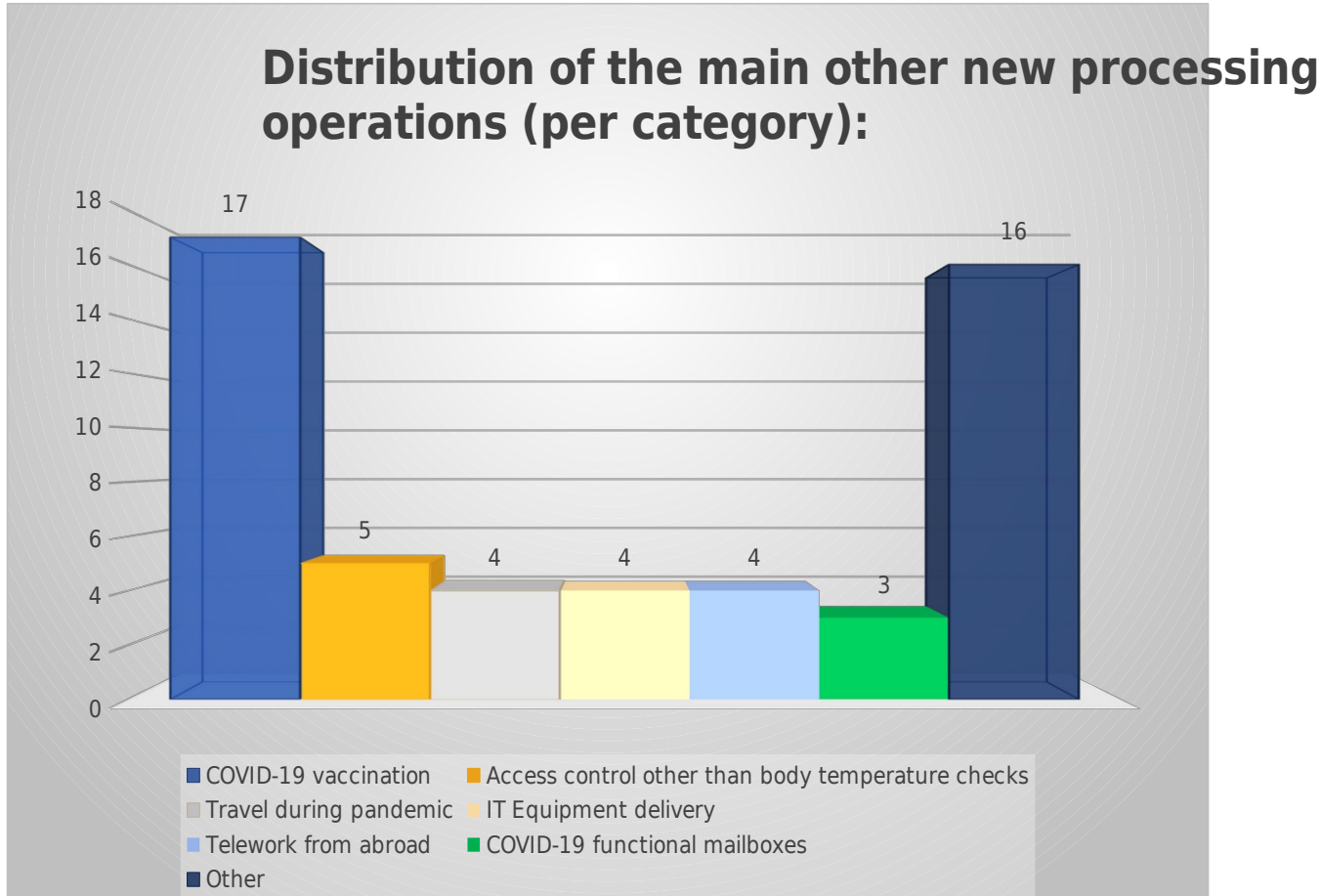
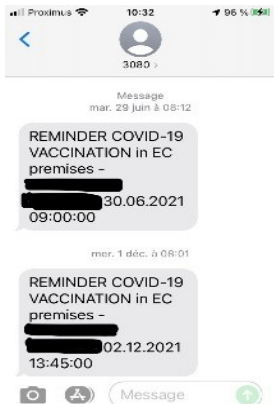
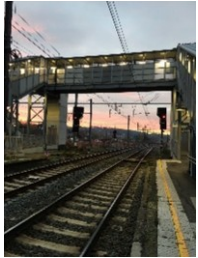


COVID-19 tests and handling of results

- Diversity
- Overlapping with contact tracing and monitoring presence
- A few numbers
 - Replies: 23
 - Mandatory: 8
 - DPIA: 3 (DPO involved in 2)
- Additional requirements from EUIs on top of national H&S rules

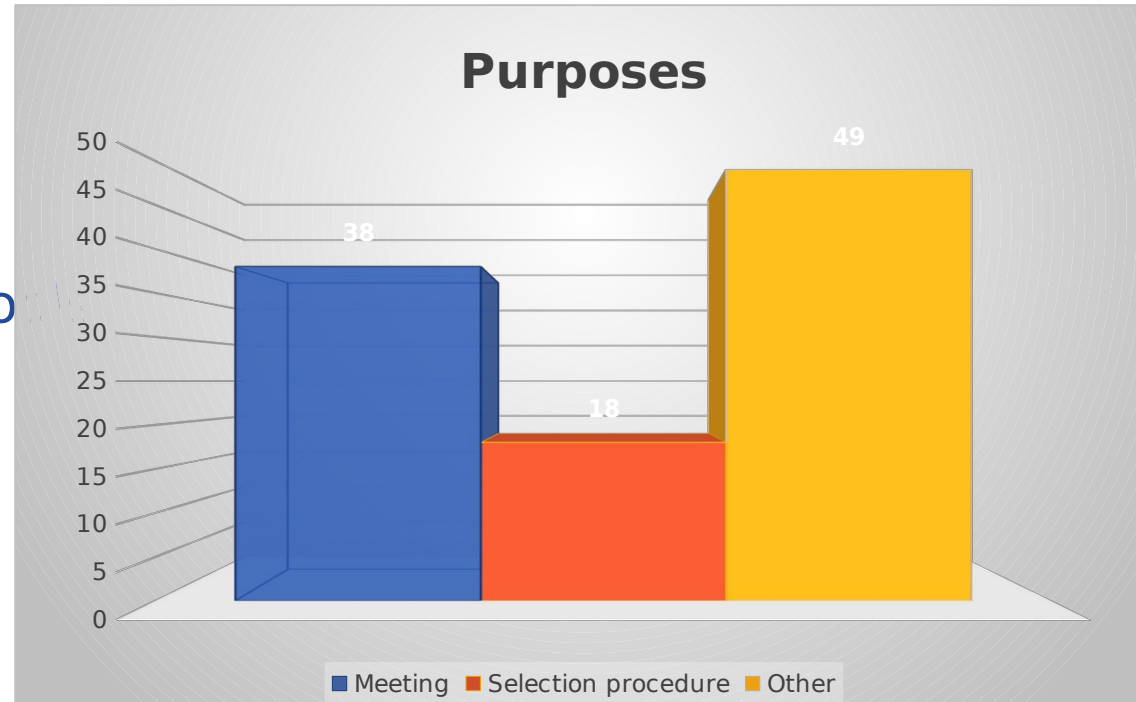


Other new processing operations



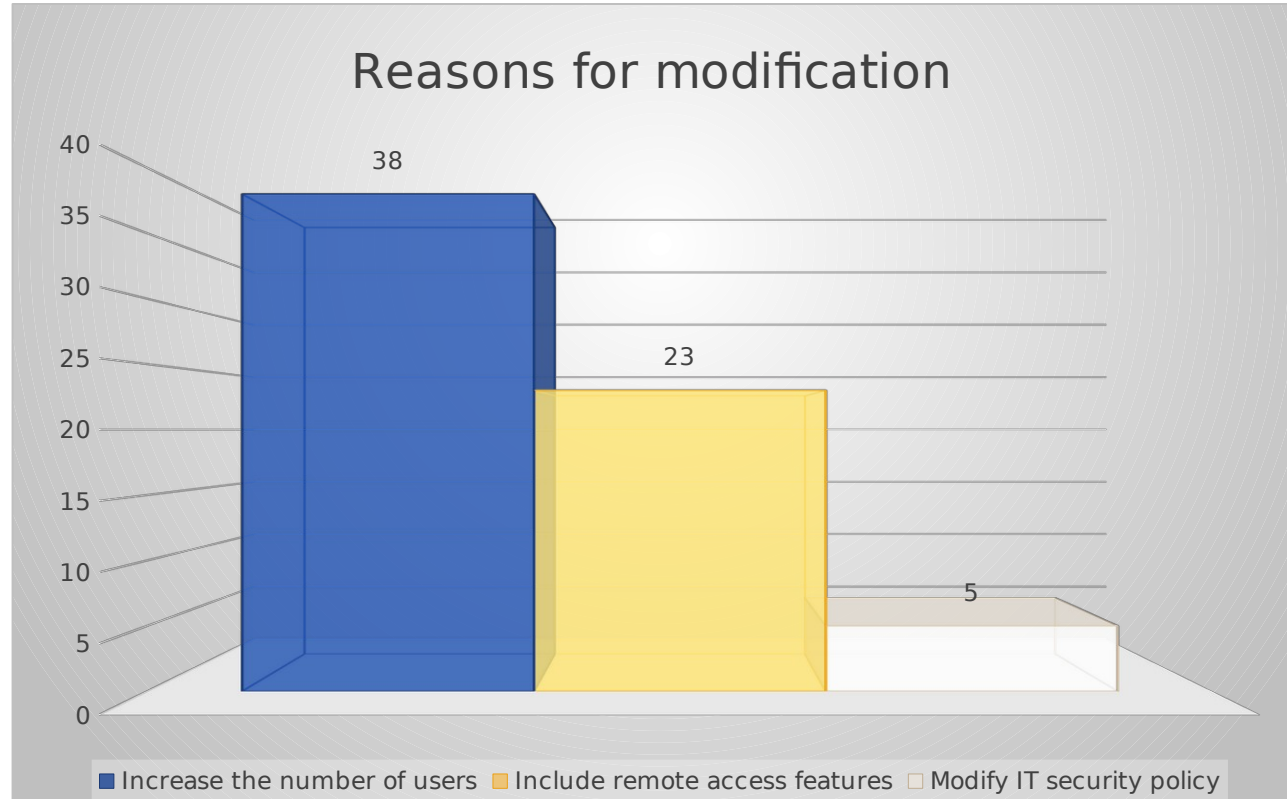
New IT tools

- 36 replies
- 81 tools (38 different) new to



Modification of existing IT tools

➤ 27 replies





What's next?

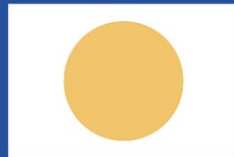
- Final report (January 2022)
 - ❖ Mapping
 - ❖ General recommendations
- Follow up
 - ❖ Non-replies
 - ❖ Audits
 - ❖ Update of/New EDPS Orientations and Guidance
 - ❖ Long-term trends





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