# Notification for Prior Checking

**Date of submission:** 15/01/2009  
**Case number:** 2009-040  
**Institution:** ETF  
**Legal basis:** article 27-5 of the regulation CE 45/2001(1)

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## Information to be Given

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<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td><strong>1/ Name and adress of the controller</strong></td>
<td>Bent Sørensen, Head of External Communication Unit, ETF</td>
</tr>
<tr>
<td><strong>2/ Organisational parts of the institution or body entrusted with the processing of personal data</strong></td>
<td>ETF ECU (External Communication Unit) officials, AIM Congress (the framework contractor)</td>
</tr>
<tr>
<td><strong>3/ Name of the processing</strong></td>
<td>Events organisation</td>
</tr>
<tr>
<td><strong>4/ Purpose or purposes of the processing</strong></td>
<td>1) To ensure the correct and smooth running of ETF events which contribute to supporting ETF external relations activities in the field of human resources development by promoting knowledge sharing and expertise development and improving the relationship, communication and transparency with key strategic partners, customers and external stakeholders, including the promotion and visibility of the ETF; 2) To support and enhance ETF external and internal communication by ensuring an efficient use of resources for the organisation and running of corporate and project specific events in the EU and partner countries.</td>
</tr>
<tr>
<td><strong>5/ Description of the category or categories of data subjects</strong></td>
<td>Event participants</td>
</tr>
<tr>
<td><strong>6/ Description of the data or categories of data</strong></td>
<td>The following data can be requested to participants during any of the registration phases: • Personal details – Title, Name, Surname, Organisation, Function in the Organisation, Organisation Address, Phone, Fax, Email; • Bank details; • Entry visas (when applicable); • Photographs taken at the event</td>
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<tr>
<td><strong>7/ Information to be given to data subjects</strong></td>
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</tr>
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(1) OJ L 8, 12.01.2001
The purpose of the processing (invitees are informed that their data will be used in connection to their participation to the event) and also the recipient of the data.

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

Data subjects can, through annual e-mail update survey, update the data related to them. In case of rectification or erasure, e-mail tool could be used.

### 9/ Automated / Manual processing operation

In the ETF data will be processed automatically using Excel and the ETF contact Data Base software. The contract AIM Congress uses a specific event management software, named AIM Congress Data Base. In principle, there are no manual processing operations.

### 10/ Storage media of data

Electronic documents are kept in the ETF Event Management System, in the ETF Contacts Database, in the ETF network (O: Themes drive), in the AIM Congress Data Base (a specific event management software), and in the AIM network. Paper documents are managed by the contractor only, and are archived in event's paper dossier files stored in cupboards.

### 11/ Legal basis and lawfulness of the processing operation

ETF External Communication Strategy and ETF Events Policy

Moreover, it is a processing operation for which the data subject has unambiguously given his/her consent - All participants in ETF events are requested in the Registration Form to give their consent to appear in the list of participants of the event.

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

AIM Congress (the framework contractor to which the events organisation services are outsourced), ETF event owner, OPOCE for dissemination purposes. Data kept in the form of mailing lists for distribution of publications. Lists made available to other institutions upon ETF authorisation.

### 13/ retention policy of (categories of) personal data

With the contractor, for all the duration of the framework contract. In ETF, personal data stored in Corporate Data Base indefinitely. Deleted on request.

**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)*

Not applicable for events organisation process.

### 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,

No

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

No

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

AS FORESEEN IN:

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

- Article 27.2.(b)
  Processing operations intended to evaluate personal aspects relating to the data subject,
Article 27.2.(c)
Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

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

Other (general concept in Article 27.1)

PLACE AND DATE: Turin, 15 December 2008
DATA PROTECTION OFFICER: Dr Liia KAARLÕP
INSTITUTION OR BODY: EUROPEAN TRAINING FOUNDATION