

RECORD OF PROCESSING OPERATION¹ ON

Personal data related to manual contact tracing for COVID-19

Nr.	Item	Description
1.0	Last update of this record	30.3.2021
1.1	Reference number	DP.HR.21.01_COVID_Contact tracing
1.2	Name and contact details of controller	Head of Group Human Resource Management personnel@eea.europa.eu
1.3	Name and contact details of joint controller(s) <i>(where applicable)</i>	Not applicable
1.4	Name and contact details of the processor <i>(where applicable)</i>	Not applicable
1.5	Name and contact details of the DPO	DPO@eea.europa.eu
1.6	Purpose of the processing	Personal data is collected and further processed for the purpose of manual contact tracing in case of COVID-19 infection. If the symptoms appear at work, or work has been performed from the office recently, EEA staff members are requested to inform the HRM group and their line manager of a suspected case or when diagnosed with the COVID-19 virus and provide a list of colleagues with whom they were in close contact.
1.7	Description of categories of persons whose data the EEA processes and list of data categories	EEA staff members and members of their household; external personnel (e.g. in-house consultants, interimaire, trainees) The personal data collected shall include the name, confirmation of a COVID-19 virus infection, and a list of colleagues with whom the person concerned was in close contact.

¹ Record of EEA 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.

1.8	Time limit for keeping the data	<p>The non-anonymised data related to COVID-19 infection will be stored for a maximum period of 14 days, starting from the date of notification, in order to trace possible exposure to other persons.</p> <p>After that, only anonymised data may be kept longer for statistical purposes.</p>
1.9	Recipients of the data	<p>The data collected will be provided to the medical advisor of the Agency and an absolute minimum number of persons involved in the process of manual contact tracing, which includes, as appropriate, the line manager, the personnel officer and the security guard.</p> <p>Where necessary, this information might be legitimately transmitted to the national health authorities.</p>
1.10	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<p>There is no transfer of personal data to third countries or international organisations.</p>
1.11	General description of security measures <i>(where possible)</i>	<p>EEA's IT systems are protected by the IT security measures implemented by the Agency that ensure an adequate security level as concerns the threats to electronic assets integrity, confidentiality and availability. Physical files are stored in locked cupboard with restricted access for dedicated staff within the HRM group.</p>
1.12	Measures for providing additional information, including how data subjects may exercise their rights of access, rectification, data portability <i>(where applicable)</i> , etc.	<p>Information is provided in the Specific privacy statement available on the EEA intranet.</p>