



RECORD OF PERSONAL DATA PROCESSING

Art. 31 of the 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 (henceforth " the Regulation")

Record No: 42

Created on (date): 2 October 2019 (Ares(2019)6181178)

Last update (date): NA

In accordance with Article 31 of the Regulation, individuals whose personal data are processed by the Executive Agency in any context whatsoever are to be protected with regard to the processing of personal data, and the Executive Agency has to keep records of their processing operations.

This record covers the following processes:

1) Mandatory records under Art 31 of the Regulation

REA staff survey in the context of internal control assessment (ICAT survey)

2) Compliance check and risk screening

The ground for the record is (tick the relevant one):

- Regularization of a data processing activity already carried out.
- Record of a new data processing activity prior to its implementation.
- Change of a data processing activity or update of previous Record.

| PART 1 (This part may be public) Name of the processing operation | | |
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| 1 | Creation and last update of this record (if applicable) | Record No: 42 Created on (date): 2 October 2019 (Ares(2019)6181178) Last update (date): 26/03/2026 |
| 2 | Title and one-sentence description of the processing | REA staff survey in the context of the internal control assessment (ICAT survey) |
| Part 1 - Article 31 Records of processing activities | | |
| 2a | Legal basis | <p>The applicable legal basis is identified under Article 5(1) (a) of the Regulation:</p> <p>(a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body.</p> <p>(a2) processing of personal data necessary for the management and functioning of the Union Institutions or bodies (Recital (22) of the Regulation);</p> <p>The basis for the processing referred to in point (a) of paragraph 1 has been laid down in particular in:</p> <ul style="list-style-type: none"> - Financial Regulation Chapter 7 (Principle of sound financial management and performance), and in particular Article 36, point 3 alinea (g). - Communication to the Commission from Commissioner Oettinger: Revision of the internal control framework C(2017) 2373, 19. April 2017) final. - REA's internal control framework (a transposition of the above EC Communication). |
| 3 | Function and contact details of the controller | <p>The controller is the European Research Executive Agency (REA), represented by its director.</p> <p>For organisational reasons, the role of the data controller has been entrusted by the Director to the delegated controller and is exercised by the Head of unit of REA.D1 - "Planning, Knowledge and Compliance" (delegated controller).</p> <p>The controller may be contacted via functional mailbox: REA-SPIC@ec.europa.eu.</p> |
| 4 | Contact details of the Data Protection Officer (DPO) | REA-DATA-PROTECTION-OFFICER@ec.europa.eu |
| 5 | Name and contact details of joint controller (where applicable) | N/A |

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| 6 | Name and contact details of processor (where applicable) | Processors are involved in the processing <input checked="" type="checkbox"/> yes <input type="checkbox"/> no DG DIGIT is processor in their role of manager of EU survey (DIGIT-EUSURVEY-SUPPORT@ec.europa.eu). DG HR is processor for SYSPER (DG HR.04). |
| 7 | Purpose of the processing | According to REA's internal control framework (Communication to the Commission from Commissioner Oettinger: Revision of the internal control framework C(2017)2373 dated 19 April 2017) final related to Internal Control Principle 16, REA should assess the effectiveness of its internal control system at least once a year. As part of this assessment, a survey to staff and managers is carried out on a biennial basis regarding selected internal control matters. There are two sets of questionnaires, one for staff and one for management. The survey is anonymous, and no link will be made between the answers given and the identity of the participants. The methodology and participation are prepared by REA's sector responsible for internal control issues. REA uses the survey results and comments made to analyse the effectiveness of its internal control system. As a follow-up of the control activity the survey's outcome will be used to publish a report and to set up an action plan to tackle any issue detected. |
| 8 | Description of the categories of data subjects | All current statutory staff of the Agency (including contract agents, temporary agents and seconded staff) with a minimum of six months' service at the Agency. |
| 9 | Description of personal data categories Indicate all the categories of personal data processed and specify which personal data are being processed for each category (between brackets under/next to each category): | Categories of personal data: <input checked="" type="checkbox"/> Identification data: first and last name; gender; <input checked="" type="checkbox"/> Contact data: email; <input checked="" type="checkbox"/> Employment related data: Start date in REA; Job family; Standard job title; REA entity (unit); <input checked="" type="checkbox"/> Other incidental and unsolicited data: "If you include additional information in your responses to open questions, please ensure it does not contain any personally identifiable details. Should you choose to provide such information, we will not process it and will delete it promptly." |
| 10 | Retention time (time limit for keeping the personal data) | REA applies the principles and retention periods indicated in Common Retention List of the Commission by analogy: For the purpose of the current process, the personal data mentioned under point 9 is kept for the time to conclude the exercise (survey, analysis and adoption of the outcome), which means |

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| | | <p>approximately 3 months from the launch of the survey.</p> <p>Is any further processing for archiving purposes in the public interest, historical, statistical or scientific purposes envisaged?</p> <p><input type="checkbox"/>yes <input checked="" type="checkbox"/>no</p> |
| 11 | Recipients of the data | <p>Who will have access to the data within the Agency?</p> <ul style="list-style-type: none"> - Staff members from the internal control (SPIC) sector as survey administrators. <p>Who will have access to the data outside the Agency?</p> <ul style="list-style-type: none"> - Staff in DG DIGIT for running the survey via the EU Survey IT tool. <p>In addition, data may be disclosed to public authorities, respecting the applicable data protection rules according to the purpose of the processing:</p> <ul style="list-style-type: none"> • The European Court of Justice (EUCJ) or a national judge as well as the lawyers and the agents of the parties in case of a legal procedure • The Investigation and Disciplinary Office of the Commission (IDOC) • The competent Appointing Authority in case of a request or a complaint lodged under Articles 90 of the Staff Regulations (AIPN) • The European Anti-Fraud Office (OLAF) in case of an investigation • The Internal Audit Service of the Commission (IAS) • The Court of Auditors (CoA) • The European Ombudsman • The European Data Protection supervisor (EDPS) • The European Public Prosecutor's Office (EPPO) <p>This transmission is restricted to the information necessary for the legitimate performance of their tasks. They are reminded of their obligation not to use the data received for other purposes than the one for which they were transmitted. If the transfer entails a change of purpose, it is expressly provided for in law and the data subject is informed of it.</p> <p>In case a staff member of the Agency moves to another Executive Agency or another EU institution, data residing under SYSPER may be automatically transferred.</p> |
| 12 | Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards? | <p>Data is transferred to countries outside the EU or EEA</p> <p><input type="checkbox"/>yes <input checked="" type="checkbox"/>no</p> <p>Data is transferred to international organisation(s)</p> <p><input type="checkbox"/>yes <input checked="" type="checkbox"/>no</p> |
| 13 | General description of the technical and organisational security measures | <p>The datasets are safeguarded in the Data Center of the Commission and therefore covered by the numerous defensive measures implemented by DIGIT to protect the integrity and confidentiality of the electronic assets of the Institution.</p> |

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| | | The login and the passwords are managed by the common certification service of the European Commission (ECAS). |
| 14 | <u>Data subject rights/restrictions</u> | <p>A data subject can exercise his/her rights (Art 14-27 of the Regulation) by submitting a request concerning access, rectification, erasure, restriction or objection to processing of their personal data to the Controller (Article 14(3) of Regulation (EU) 2018/1725) by sending their request to the Functional Mailbox or to the email indicated in the record.</p> <p>These rights may be restricted only under certain specific conditions as set out in the applicable <u>Restriction Decision</u> in accordance with Article 25 of Regulation (EU) 2018/1725. Restrictions may also apply due to communication of a personal data breach or due to the confidentiality of electronic communications.</p> <p>Further to the above, data subjects may contact the REA Data Protection Officer (DPO): <u>REA-DATA-PROTECTION-OFFICER@ec.europa.eu</u></p> <p>In case of conflict, complaints can be addressed to the European Data Protection Supervisor: <u>EDPS@edps.europa.eu</u></p> |
| 15 | Information to data subjects/Data protection notice (DPN) | A Data Protection Notice (DPN) relevant to this data processing is available in the <u>REA public register of records</u> and it is transmitted by the data controller to the data subjects, where applicable. |