



EEB2
CONTROLLER'S RECORD OF PERSONAL DATA
PROCESSING ACTIVITY

Item No.	28	
1.	Name, department and e-mail address of Delegated Controller (author)	Charlier Frank (IT-Department) frank.charlier@eursc.eu
2.	Name, department and e-mail address of Joint Controller (if any) - attach arrangement between Joint Controllers	
I. Processing Activity		
3.	Name of processing	Management of staff, teachers, trainees, certain APEE members, pupils, pupils' legal representatives and sports facility users identification
4.	Description and purpose of processing	<p>EEB2 provides a badge to all teachers, staff, trainees, pupils, pupils legal representatives and sports facility users for identification purposes. The members of the parents association (APEE) who work on the premises of EEB2 also receive a badge.</p> <p>The photo badges are used for two purposes:</p> <ol style="list-style-type: none"> 1. Badges are checked by the guards at all entry points of the EEB2 premises for admitting persons to the premises; 2. Teachers' badges have an electronic chip which allows the badge holder to copy print and scan on the Multi Functional Printers. A print management software is used to keep account of the number of sheets of paper used, for budget purposes. <p><u>Photographs on badges:</u></p> <ul style="list-style-type: none"> • The processor (photographer) takes the photographs for badges of staff, teachers and pupils; • The IT department takes the photographs for badges of trainees and APEE members who work on the EEB premises. <p><u>Fabrication of badges:</u></p> <ul style="list-style-type: none"> • The IT department fabricates the badges of teachers, staff and trainees; • The processor (VanderEycken) fabricates new badges for pupils each year in a different layout, using a text file from the IT department containing the name, ID number and class of each pupil. <p>The IT-department also provides badges to all pupils' legal representatives and sports facility users (without photo) for admission to school premises.</p>
5.	Name and e-mail address of processor (sub-contractor)	VanderEycken (School Photographer); Fact-group (Security company).

		Contracts with EEB2 are attached
6.	Does the processing operation involve any automated decision-making/profiling?	<input type="checkbox"/> Automated <input checked="" type="checkbox"/> Manual (not automated)
7.	Storage media	<input type="checkbox"/> Paper <input checked="" type="checkbox"/> Electronic
8.	Retention period	<p><i>Please suggest what you believe would be a reasonable retention period based on need and any applicable EU or Belgian legal obligations of which you are aware:</i></p> <input type="checkbox"/> ___ days <input type="checkbox"/> ___ weeks <input type="checkbox"/> ___ months <input type="checkbox"/> ___ years <input checked="" type="checkbox"/> Other
<p>Return of badges:</p> <ul style="list-style-type: none"> • Upon termination of service, staff, teachers and members of the APEE return the badge to the administration which destroys the badges; • Pupils return the badge from the previous school year when they receive the badge for the current school year. 		
II. Legal basis		
9.	Legal basis of processing	<input type="checkbox"/> Data subject's consent (attach blank consent form) <input type="checkbox"/> Necessary for compliance with legal obligation <input type="checkbox"/> Necessary to protect data subject's vital interests <input checked="" type="checkbox"/> Necessary for performance of task carried out in the public interest or in controller's official authority <input type="checkbox"/> Necessary for legitimate interests of controller or 3 rd party <input type="checkbox"/> Necessary for performance of contract
III. Data		
10.	Categories of data subjects	<input checked="" type="checkbox"/> Pupils <= 16 yrs old <input checked="" type="checkbox"/> Pupils > 16 yrs old <input checked="" type="checkbox"/> Parents <input checked="" type="checkbox"/> PAS <input checked="" type="checkbox"/> Seconded staff (excluding teachers) <input checked="" type="checkbox"/> Seconded staff (teachers) <input checked="" type="checkbox"/> Locally recruited staff <input checked="" type="checkbox"/> Interim staff <input type="checkbox"/> (Successful) candidates (to a vacancy) <input type="checkbox"/> Unsuccessful candidates (to a vacancy) <input checked="" type="checkbox"/> Trainees <input type="checkbox"/> Vendors <input checked="" type="checkbox"/> Other (members of the APEEE and sports facility users)
11.	Categories of personal data collected	<input checked="" type="checkbox"/> Name <input checked="" type="checkbox"/> Surname <input type="checkbox"/> Date of birth <input type="checkbox"/> City of birth <input type="checkbox"/> Country of birth <input type="checkbox"/> Nationality <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Data concerning siblings <input type="checkbox"/> School email address <input type="checkbox"/> Personal email address <input type="checkbox"/> Professional email address <input type="checkbox"/> Professional phone number <input type="checkbox"/> Personal phone number <input type="checkbox"/> Home address <input checked="" type="checkbox"/> Picture

		<input checked="" type="checkbox"/> Student ID number <input type="checkbox"/> Parental marital status <input type="checkbox"/> Name of legal guardian (main custody of the child) <input type="checkbox"/> Salary or economic information <input checked="" type="checkbox"/> Other (chip storing id-number/Username)
12.	Documents collected containing personal data	<input type="checkbox"/> Copy of passport <input type="checkbox"/> Copy of ID <input type="checkbox"/> Copy of transport document <input type="checkbox"/> Birth certificate <input type="checkbox"/> Marriage certificate <input type="checkbox"/> Document proving the exercise of parental authority <input type="checkbox"/> CV <input type="checkbox"/> Motivation letter <input type="checkbox"/> Application email of the candidate <input type="checkbox"/> Correspondence with the candidate <input type="checkbox"/> Declaration concerning the relevant professional experience <input type="checkbox"/> Declaration concerning allowances <input type="checkbox"/> Copy of relevant diploma <input type="checkbox"/> Reference letter <input type="checkbox"/> Work contract <input type="checkbox"/> Evaluation sheets
13.	Special categories of data	<p><i>Please specify type and justification for processing:</i></p> <p>1. Type:</p> <input type="checkbox"/> health data <input type="checkbox"/> data revealing religious/philosophical beliefs <input type="checkbox"/> data revealing trade union membership <input checked="" type="checkbox"/> data revealing racial or ethnic origin <input type="checkbox"/> data concerning a natural person's sex life or sexual orientation <input type="checkbox"/> data revealing political opinions <input type="checkbox"/> genetic data <input type="checkbox"/> biometric data for the purpose of uniquely identifying a natural person <input type="checkbox"/> data concerning criminal convictions and offences <p>2. Justification for processing:</p> <input type="checkbox"/> data subject's explicit consent <input type="checkbox"/> relates to personal data made public by the data subject <input type="checkbox"/> Processing necessary to meet obligations in field of employment, social security and social protection law <input type="checkbox"/> Processing necessary to protect data subject's or other natural person's vital interests where data subject incapable of giving consent <input type="checkbox"/> Processing necessary for establishment, exercise or defence of legal claims <input checked="" type="checkbox"/> Processing necessary for reasons of substantial public interest <input type="checkbox"/> Processing necessary for medical/health care <input type="checkbox"/> Processing necessary for public health <input type="checkbox"/> Processing necessary for archiving, research or statistics
IV. Rights of Data Subjects		
14.	Privacy statement (Information provided to the data subject)	<input checked="" type="checkbox"/> Data collected from data subject <input checked="" type="checkbox"/> Data not obtained from data subject
15.	Manner of providing the privacy statement to the data subjects (procedure to grant rights)	<p><i>Please suggest what you believe would be a reasonable way to provide the privacy statement, such as a reference in the first correspondence with the data subject to a link to the EEB2 website where the statement can be viewed.</i></p> <input checked="" type="checkbox"/> online <input type="checkbox"/> email

		<input type="checkbox"/> text Specify:
V. Access and disclosure		
16.	Recipients of the data	<i>Please specify any recipients outside of EEB2 that receive the data e.g. OSG, banks, travel agencies, etc. NA</i>
17.	Transfers to non-EU countries or international organisations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If transfers are made, specify: Non-EU country to which transfers made_____ Basis of transfer: <input type="checkbox"/> Adequacy decision relating to recipient country (Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the US (limited to the Privacy Shield framework) <input type="checkbox"/> Appropriate safeguards established <input type="checkbox"/> Derogation: <input type="checkbox"/> Data subject's explicit consent <input type="checkbox"/> Transfer necessary for performance of contract with data subject <input type="checkbox"/> Transfer necessary for performance of contract with other on data subject's behalf <input type="checkbox"/> Transfer necessary for important reasons of public interest <input type="checkbox"/> Transfer necessary for establishment, exercise or defence of legal claims <input type="checkbox"/> Transfer necessary to protect vital interests of data subject or others where data subject incapable of giving consent <input type="checkbox"/> Transfer of data from a public register
18.	Is a Data Protection Impact Assessment required?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes, because the processing involves high risk of the following type: <input checked="" type="checkbox"/> Sensitive data or data of a highly personal nature <input type="checkbox"/> Data concerning vulnerable data subjects <input checked="" type="checkbox"/> Data processed on a large scale <input type="checkbox"/> Systematic monitoring <input type="checkbox"/> Evaluation or scoring <input type="checkbox"/> Innovative use or applying technological or organisational solutions <input type="checkbox"/> Automated decision making with legal or similar significant effects <input type="checkbox"/> Prevents data subject from exercising a right or using a service or a contract