



Eurojust record of processing activity

Record of processing personal data activity, 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

Part I –Article 31 Record (this part is publicly available)

Nr.	Item	Description
COVID-19 pandemic – follow-up to ensure health and safety of post-holders		
1.	Last update of this record	30/10/2020
2.	Reference number	HRU-13 (November 2020)
3.	Name and contact details of controller	Head of Human Resources Unit HoHRConfidential@eurojust.europa.eu
4.	Name and contact details of DPO	dpo@eurojust.europa.eu
5.	Name and contact details of joint controller (where applicable)	N/A
6.	Name and contact details of processor	The contact tracing process at Eurojust is as follows: 1) Staff member/post-holder (or if unable to do so themselves, a person designated by them on their behalf) informs HRAdmin@eurojust.europa.eu that they have tested positive for COVID-19. In the email, they provide HR Admin with the following information: - the first date that they started experiencing symptoms or, if asymptomatic, the date of the positive test, - the dates they were in the Eurojust premises in the 10 days prior to the above date, if applicable, and - a list of Eurojust post-holders/contractors/visitors with whom they were in close contact ¹ during that period.

¹ A close contact is defined in line with the ECDC guidelines as someone having had face-to-face contact with a COVID-19 case within two metres for more than 15 minutes; or having had physical contact with a COVID-19 case; or having unprotected direct contact with infectious secretions of a COVID-19 case (e.g. being coughed on); or who was in a closed environment (e.g. office, meeting room) with a COVID-19 case for more than 15 minutes.

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		<p>2) HR Admin notifies the persons identified as close contacts using a standard template communication and an individual phone call.</p> <p>3) HR Admin informs Security of the list of persons not authorised to access the premises (due to positive test or being a close contacts), without specifying the reason.</p> <p>4) HR Admin informs the line manager of the need to telework, if the person would otherwise be expected to come to the office, or of sick leave if applicable</p> <p>5) If any contactors/external visitors must be notified, HR Admin informs ELU/SEC as applicable, who then send the template communication referred to in point 2.</p> <p>Therefore, the following actors are data processors:</p> <p><u>As it concerns post-holders testing positive who have been in the Eurojust premises in the 10 day tracing period (Eurojust staff members, SNEs, National Desk members, interns)</u></p> <ul style="list-style-type: none"> - Eurojust staff in the HR Admin Sector HRAdmin@eurojust.europa.eu, who will receive the notification of a positive test and the list of close contacts, inform and follow up with the close contacts (post-holders) and inform the other actors as outlined below. - Staff in the Security Unit Security@eurojust.europa.eu will receive a list of persons not allowed to enter the premises and any changes to this list from HR Admin, without specification of the reason (positive test, close contact etc.). - Line managers: If a staff member testing positive or identified as a close contact is in a role for which physical presence in the office is normally required, HR Admin will inform the line manager they will not be present, indicating either that the staff member is on sick leave or, if they are able to work (e.g. if asymptomatic), that the staff member needs to telework due to sickness. If the staff member is usually teleworking and would not be required to come to the office, HR Admin informs the line manager only in case of sick leave. . - Staff in the Security Unit Security@eurojust.europa.eu and in the Events and Logistics Unit Nkarayannis@eurojust.europa.eu will be informed of the names of close contacts <u>only if</u> there is a need to liaise with companies providing external contractors and/or visitors, e.g. to forward the notification to the person who was identified as a close contact (as these units are the ones with the contact details of the contractors/visitors).

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		<p><u>As it concerns externals testing positive who have been in the Eurojust premises in the 10 day tracing period (contractors, visitors, participants in operational meetings)</u></p> <p>Visitors will be directed via instructions communicated in advance of their visit (template in Events Force) that if they test positive within the 10 day contact tracing period, they should inform HRAdmin@eurojust.europa.eu. Should the visitor voluntarily inform the entity handling their visit instead, e.g. Events or the National Desk, that entity will direct them to HR Admin for the rest of the process as outlined in this document.</p> <p>The following are data processors:</p> <ul style="list-style-type: none"> - Eurojust staff in the HR Admin Sector HRAdmin@eurojust.europa.eu, who will receive the notification of positive test and the list of close contacts, inform and follow up with the close contacts (post-holders) and inform the other actors as outlined below. - Staff in the Security Unit Security@eurojust.europa.eu will receive a list of persons not allowed to enter the premises and any changes to this list from HR Admin, without specification of the reason (positive test, close contact etc.). - Line managers: If a staff member is identified as a close contact and is in a role for which physical presence in the office is normally required, HR Admin will inform the line manager they will not be present, indicating either that the staff member is on sick leave or, if they are able to work (e.g. if asymptomatic), that the staff member needs to telework due to sickness. If the staff member is usually teleworking and would not be required to come to the office, HR Admin informs the line manager only informed in case of sick leave. - Staff in the Security Unit Security@eurojust.europa.eu and in the Events and Logistics Unit Nkarayannis@eurojust.europa.eu will be informed of the names of close contacts <u>only if</u> there is a need to liaise with companies providing external contractors and/or visitors, e.g. to forward the notification to the person who was identified as a close contact (as these units are the ones with the contact details of the contractors/visitors).
7.	Purpose of the processing	To record data of persons who are confirmed to have the COVID-19 virus and who have been in the Eurojust premises and in close contact with other Eurojust post-holders.

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		<p>The collected information will enable Eurojust to obtain information on situations when infected persons have been in close contact with other post-holders in the Eurojust premises, in order to inform those post-holders of the possibility of infection and their need to self-isolate.</p>
8.	<p>Description of categories of persons whose data are processed and list of data categories</p>	<p>To implement the process outlined in section 6, the following categories of data are processed:</p> <p><u>By HR Admin</u></p> <p>The following data will be provided to HR Admin by email by persons <u>who have been in the Eurojust premises in the last 10 days</u> and are confirmed to have coronavirus:</p> <ul style="list-style-type: none"> - First and last name - Medical status (limited only to “confirmed COVID-19 positive test” and whether symptomatic or asymptomatic. No detail of symptoms or other health information.) - Date of onset of symptoms or, if asymptomatic, the date of the positive test (used to calculate the contact tracing period), - Date(s) they were in the Eurojust premises in the 10 days prior to the above date, if applicable, and - A list of Eurojust post-holders/contractors or visitors to the Eurojust building (first and last name) with whom the person indicates they were in close contact during that period. <p>The following information will be provided to HR Admin by email by persons identified through Eurojust’s contact tracing process as close contacts, who subsequently test negative for coronavirus:</p> <ul style="list-style-type: none"> - First and last name - Existence of negative test result (the test itself is not shared) and the date of the test, so that the person’s name can be removed from the list of persons not authorised to access the premises. <p><u>By Security</u></p> <p>The following data will be provided by email from HR Admin to Security@eurojust.europa.eu</p> <ul style="list-style-type: none"> - First and last name of persons not permitted to enter the premises, without specification of the reason (positive test, identified close contact etc.), and any update to that list i.e. when a person obtains a negative test result and is permitted to enter again. <p><u>By Security and/or ELU (only when applicable)</u></p> <p>The following data will be provided by email from HR Admin to Security@eurojust.europa.eu and/or NKarayannis@eurojust.europa.eu, as applicable</p>

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		<ul style="list-style-type: none"> - First and last name of persons identified as close contacts, with a template communication for SEC/ELU to send to the contractor/visitor by email notifying them that they have been identified as a close contact and advising the person to self-isolate and request a COVID-19 test.
9.	Time limit for keeping the data	<p>The data processed as outlined in sections 6 & 8 will be retained for one month, to ensure follow-up and contact tracing. After this period:</p> <ul style="list-style-type: none"> - HR Admin staff will delete the emails exchanged under sections 6 and 8 manually. No data will be stored elsewhere (DMS, physical files etc.) - If applicable, ELU and SEC will delete the data they have received/sent under sections 6-8 manually. No data will be stored elsewhere (DMS, physical files etc.)
10.	Recipients of the data	<p>Staff in the HR Admin team with access to the HR Admin mailbox.</p> <p>Head of HR as data controller.</p> <p>Staff in SEC and ELU (only where an external contractor/visitor informs they have tested positive or is identified as a close contact, strictly no other health-related information)</p> <p>Where someone is identified as a close contact, they will be informed that they have been in close contact with a confirmed COVID-19 case using a template communication, which does not disclose the name or any details about the case. The communication will be sent by email from HR Admin to any close contacts who are post-holders, and by SEC/ELU to any external contractors or visitors for whom they are responsible. HR Admin will also contact affected post-holders on their registered phone numbers (in e-HR and the Eurojust phone directory).</p>
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No.
12.	General description of security measures, where possible.	<p>Access to the HR Admin mailbox and to the Security mailbox is restricted to staff in the HR Admin Sector and Security respectively. Where ELU must be notified, this information is sent to the Head of Unit directly and the mailbox is not accessible to others. The information will only be kept in the mailboxes until it is manually deleted in accordance with the timelines in section 9 and will not be printed or stored in the DMS.</p>

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13.	<p>For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:</p>	<p>The HR unit will inform Eurojust post holders of their rights in relation to the data collected via the medical protocol document, which will be permanently accessible on the intranet.</p> <p>ELU/SEC will inform externals – if involved - of the same rights in the communication sent to these parties prior to their attendance at Eurojust (through Events Force or other invitation/instruction to come to the premises).</p>