# Record of Processing of processing activities according to Article 31 Regulation 2018/1725

**NAME of data processing:**
Publication of F4E articles

**Last update:** March 2020

<table>
<thead>
<tr>
<th>1) Controller(s) of data processing operation (Article 31.1(a))</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Controller: Organisational entity of Fusion for Energy (F4E)</td>
</tr>
<tr>
<td>o Unit / Department <strong>responsible</strong> for the processing activity: Communication Unit</td>
</tr>
<tr>
<td>o Contact: <a href="mailto:Communications@f4e.europa.eu">Communications@f4e.europa.eu</a></td>
</tr>
<tr>
<td>• Data Protection Officer (DPO): <strong><a href="mailto:DataProtectionOfficer@f4e.europa.eu">DataProtectionOfficer@f4e.europa.eu</a></strong></td>
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<tr>
<th>2) Who is actually conducting the processing? (Article 31.1(a))</th>
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<tbody>
<tr>
<td>The data is processed by F4E (responsible unit) itself ............................................................... ☑</td>
</tr>
<tr>
<td>The data is processed by a third party (e.g. contractor) (Art. 29 – Processor) : ......................... ❑</td>
</tr>
<tr>
<td>Contact point at external third party (e.g. Privacy/Data Protection Officer):</td>
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</tbody>
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1 Regulation 2018/1725 of 23 October 2018 “on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data”. O.J 21.11.2018, L295/39.
### 3) Purpose and Description of the processing (Article 31.1(b))

**Why is the personal data being processed?** Specify the underlying reason for the processing and what you intend to achieve. Describe, summarise the substance of the processing.

*When you (later on) intend to further process the data for another purpose, please inform the Data Subject in advance.*

The purpose of processing these data is to:

- report about F4E activities for communication purposes.
- publish articles on the F4E Net or on the F4E External Website, which may include names, images and job positions of F4E staff, visitors and suppliers

### 4) Lawfulness of the processing (Article 5(a)–(d)):

*Mention the legal bases which justifies the processing*

Processing necessary for:

(a) performance of tasks in the public interest attributed by EU legislation (including management and functioning of F4E) ................................................................. ☑


- Statutes annexed to the Council Decision (Euratom) No 198/2007 “establishing the European Joint Undertaking for ITER and the Development of Fusion Energy and conferring advantages upon it”, as last amended on 22 February 2021, in particular Article 10 thereof

- Staff Regulations of Officials (SR) and the Conditions of Employment of Other Servants of the European Communities (CEOS), in particular [if applicable, Article… of the Staff Regulations regarding...]

(b) compliance with a *specific* legal obligation for F4E to process personal data?..............□

(c) necessary for the performance of a contract with the data subject or to prepare such a contract.................................................................□

(d) Data subject has given consent (ex ante, freely given, specific, informed and unambiguous consent)................................................................. ☑
Consent is implicit in the approval of the final version of the article by the person whose data are mentioned on it. This consent is not stored.

### 5) Description of the data subjects (Article 31.1(c))

**Whose personal data is being processed?**

F4E staff, visitors and suppliers

### 6) Categories of personal data processed (Article 31.1(c))

Please give details in relation to (a) and (b). In case data categories differ between different categories of data subjects, please explain as well.

(a) **General personal data:**
Names, images and job positions of F4E staff, visitors and suppliers

(b) **Sensitive personal data** (Article 10)
No sensitive personal data are processed.

### 7) Recipient(s) of the data (Article 31.1 (d)) – Who has access to the personal data?

Recipients are all people to whom the personal data is disclosed (“need to know principle”). Not necessary to mention entities that may have access in the course of a particular investigation (e.g. OLAF, Court, EDPS).

The following recipients have access to the personal data processed:

The articles containing the personal data will be published in our website so they would be of public access.

- IDM Manager, if necessary for support,
- ICT Officer responsible for the dedicated database, if necessary for technical support.

Also, only if appropriate and necessary for monitoring or inspection tasks, access may be given to: e.g. F4E Director, Head of Admin., DPO and Anti-Fraud & Ethics Officer, Head or responsible officer of LSU, IAC, IDOC.

### 8) Transfers to third countries or International Organizations (Article 31.1 (e))

If the personal data is transferred outside the EU, this needs to be specifically mentioned, since it increases the risks of the processing operation (Article 47 ff.).

Data is transferred to third countries or International Organizations recipients:
Yes ................................................................................................................................................................. □
No ................................................................................................................................................................... ☑

If yes, specify to which country/IO:

If yes, specify under which safeguards and add reference :

- Adequacy Decision (from the Commission) .......................................................................................... □
- Memorandum of Understanding between public authorities/bodies ................................................. □
- Standard Data Protection Clauses (from the EDPS/Commission) ..................................................... □
- Binding Corporate Rules ................................................................................................................... □
- Others, e.g. contractual/agreements (subject to authorisation by the EDPS) ................... □

Reference:
Not Applicable

9) Technical and organisational security measures (Articles 31.1(g) and 33)

Please specify where the data is stored (paperwise and/or electronically) during and after the processing. Specify how it is protected ensuring “confidentiality, integrity and availability”. State in particular the “level of security ensured, appropriate to the risk”.

Security measures are implemented to ensure integrity, confidentiality and availability of information. The default provisions include backups, centralized logging, software updates and continuous vulnerability assessment and follow-up. Specific provisions resulting from the characteristics of the information system may lead into the implementation of encryption, two factor authentication among others found relevant following a risk analysis.

10) Retention time (Article 4(e))

How long is it necessary to retain the data and what is the justification for this retention period? If appropriate, differentiate between the categories of personal data. If the retention period is unknown, please indicate the criteria for determining it.

Retention period is unknown. Data will be available as long the website and the intranet remain alive.
11) Information/Transparency (Article 14-15)
*Information shall be given in a concise, transparent and easily accessible form, using clear and plain language.*

PN to be added to the F4E’s intranet and external website.