



RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

according to Article 31 of [Regulation \(EU\) 2018/1725](#)

Title
'Green Pass' obligation for access to EFSA premises

1) Controller(s) of data processing activity (Article 31.1(a))
<p>EFSA unit in charge of the processing activity: Corporate Services (CORSER)</p> <p>EFSA Data Protection Officer (DPO): DataProtectionOfficer@efsa.europa.eu</p> <p>Is EFSA a co-controller? No</p> <p>If yes, indicate who is EFSA's co-controller:</p>

2) Who is actually conducting the processing? (Article 31.1(a))
<p>The data is processed by EFSA itself X</p> <p><i>Indicate the EFSA units or teams involved in the data processing:</i></p> <p>The Corporate Services Unit (CORSER) is the data controller in charge of the Green Pass verification which is carried out by security guards under the supervision of the EFSA Security Officer.</p> <p>The processing operation is conducted together with an external party X</p> <p><i>Please provide below details on the external involvement:</i></p> <p>Security guards based on a procurement service contract (IVRI/Securitalia).</p>

3) Purpose of the processing (Article 31.1(b))
<p>EU Digital COVID Certificates (so-called 'Green Pass') are issued by public health authorities in the EU Member States conform with the requirements laid down in Regulation (EU) 2021/953. As from 15 October 2021 the Green Pass of every person entering the EFSA office building including staff and visitors, is verified by the security guards using the "VerificaC19" app issued by the Italian health authorities. It is a temporary health & safety measure against the risk for infection in the workplace applied at EFSA in accordance with national laws and regulations applicable to Italian public administration and private sector and extended to EFSA as an agency of the EU having its seat in Italy. The Green Pass verification is a temporary measure that will be regularly reviewed in alignment with the Italian legislation.</p>

The sole purpose of the Green Pass verification is to grant staff and visitors with access to the EFSA building premises and the verification data is not used for any other unrelated purpose.

4) Legal basis and lawfulness of the processing (Article 5(a)-(d)):

Processing necessary for:

- | | |
|---|-------------------------------------|
| (a) a task carried out in the public interest or in the exercise of official authority vested in EFSA | <input checked="" type="checkbox"/> |
| (b) compliance with a legal obligation to which EFSA is subject | <input checked="" type="checkbox"/> |
| (c) performance of a contract with the data subject or to prepare such contract | <input type="checkbox"/> |
| (d) The data subject has given consent (ex ante, explicit, informed) | <input type="checkbox"/> |

Further details on the legal basis:

As mandated by Italian national legislation, the Green Pass verification derives from EFSA's responsibility to accord working conditions complying with health and safety standards as provided in Article 1e(2) of the Staff Regulations and Articles 10 and 80 of the Conditions of Employment of other Servants (CEOS). Recognizing that the verification process concerns sensitive health-related data in the meaning of Art. 10 of the EDPR, the processing is considered to be permitted in application of Article 10(2)(i) 'for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health'.

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

Whose personal data are processed?

- | | |
|---|-------------------------------------|
| EFSA statutory staff | <input checked="" type="checkbox"/> |
| Other individuals working for EFSA (consultants, trainees, interims, experts) | <input checked="" type="checkbox"/> |
| Stakeholders of EFSA, including Member State representatives | <input checked="" type="checkbox"/> |
| Contractors of EFSA providing goods and services | <input checked="" type="checkbox"/> |
| The general public, including visitors, correspondents, enquirers | <input checked="" type="checkbox"/> |
| Relatives of the data subject | <input type="checkbox"/> |
| Other categories of data subjects (please detail below) | <input checked="" type="checkbox"/> |

Further details concerning the data subjects whose data are processed:

All individuals entering the EFSA office building are subject to the Green Pass verification

6) Type of personal data processed (Article 31.1(c))	
a) General personal data	
The personal data concerns:	
Name, contact details and affiliation	<input checked="" type="checkbox"/>
Details on education, expertise, profession of the person	<input type="checkbox"/>
Curriculum vitae	<input type="checkbox"/>
Financial details	<input type="checkbox"/>
Family, lifestyle and social circumstances	<input type="checkbox"/>
Goods and services the person provides	<input type="checkbox"/>
Other personal data (please detail):	<input checked="" type="checkbox"/>
b) Sensitive personal data (Article 10)	
The personal data reveals:	
Racial or ethnic origin of the person	<input type="checkbox"/>
Political opinions or trade union membership	<input type="checkbox"/>
Religious or philosophical beliefs	<input type="checkbox"/>
Health data or genetic or biometric data	<input checked="" type="checkbox"/>
Information regarding the person's sex life or sexual orientation	<input type="checkbox"/>
<i>Further details concerning the personal data processed:</i>	
<p>The Green Pass verification is performed at the entrance of the office building by means of the QR code scanning through the app "VerificaC19". The QR code scanning displays on the scanning device of the guards the confirmation on the validity of the Green Pass as well as the name and the birth date of the holder. Upon the validity of the green pass, access to the building premises will be granted. Staff, trainees and interims who do not hold a valid green pass will be invited to telework.</p>	

7) Recipients of the data (Article 31.1(d))	
Line managers of the data subject	<input type="checkbox"/>
Designated EFSA staff members	<input checked="" type="checkbox"/>
Other recipients (<i>please specify</i>):	<input type="checkbox"/>
<p>The EFSA security guards under the supervision of the EFSA Security Officer have access to the personal data at hand (see point 6) for the purpose of the QR Code scanning and allowing access to the EFSA building.</p>	

8) Transfers to recipients outside the EEA (Article 31.1 (e))

Data are transferred to third country recipients:

Yes No

If yes, specify to which third country:

If yes, specify under which safeguards:

Adequacy Decision of the European Commission

Standard Contractual Clauses

Binding Corporate Rules

Memorandum of Understanding between public authorities

9) Technical and organisational security measures (Article 31.1(g))

How is the data stored?

On EFSA's Document Management System (DMS)

On a shared EFSA network drive or in an Outlook folder

In a paper file

Using a cloud computing solution (please detail the service provider and main characteristics of the cloud solution, e.g. public, private)

On servers of an external service provider

On servers of the European Commission or of another EU Institution

In another way (*please specify*):

Please provide some general information on the security measures applied:

The Green Pass of every person entering the EFSA office building is verified by the security guards using the "VerificaC19" app issued by the Italian health authorities, by means of a QR code scanning device. No personal data is stored nor memorised in the devices used for the QR code scanning and the information is not sent or transmitted anywhere.

In accordance with the data minimisation principle, the QR code scanning solely results in a confirmation of the authenticity, validity and integrity of the Green Pass in question.

10) Retention period (Article 4.1 (e))

No personal data related to the Green Pass verification process is retained by EFSA.

11) Consultation with the Information Security Officer

Was the ISO consulted on the processing operation ?

Yes No

If yes, please provide some details on the consultation with the ISO:

12) Information given to data subjects (Articles 15 and 16)

Has information been provided to data subjects on the way their data is processed including how they can exercise their rights (access, rectification, objection, data portability)? Usually this information is provided in a Privacy Statement, specifying the controller's contact details. As possible, please provide a link to the relevant Privacy Statement or a description.

The Decision of the EFSA Executive Director concerning the 'Green Pass' obligation for access to EFSA premises includes a data protection notice as an annex. This ED Decision is available to staff on EFSA's Document Management System and has been communicated to all staff in the context of bi-weekly updates of the Crisis Management Team concerning the evolution of the pandemic and the measures in place at EFSA.

It shall be ensured that the data protection notice will be made available to visitors at the EFSA reception upon their request.

Concerning any external experts travelling to Parma to attend scientific working group or panel meetings organized in the EFSA premises physically or in a hybrid format, it shall be ensured that they are timely and duly informed on the Green Pass requirement for entering the EFSA premises, more specifically before arrangements for their travelling to Parma are made.

Last update of this record: 12/10/2021

Reference: DPO/GOV/16