



RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

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

Title
Body temperature measurement of staff & visitors at EFSA entrance

1) Controller(s) ¹ of data processing activity (Article 31.1(a))
<p>EFSA unit in charge of the processing activity: CORSER / H&S Officer</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 <input checked="" type="checkbox"/></p> <p><i>Indicate the EFSA units or teams involved in the data processing:</i></p> <p>Security guards under the supervision of the EFSA Health & Safety Officer</p> <p>The processing operation is conducted together with an external party <input type="checkbox"/></p> <p><i>Please provide below details on the external involvement:</i></p>

3) Purpose of the processing (Article 31.1(b))
<p>The body temperature of each person entering the EFSA office building including staff and visitors, is measured by the security guards. Access to the office is allowed if the person's temperature marks below 37.5°C. The measurement is organised as part of the health & safety measures to contrast the COVID-19 pandemic and will be continued as long as necessary for this purpose.</p>

4) Legal basis and lawfulness of the processing (Article 5(a)-(d)):
<i>Processing necessary for:</i>

¹ The controller decides on the purposes and means of the data processing. In case of joint controllership (e.g. systems of the European Commission applied by EFSA or jointly with another agency), EFSA is a co-controller.

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

Further details on the legal basis:

The body temperature measurement forms part of a broader set of health & safety measures adopted in the EFSA workplace to contrast the COVID-19 pandemic, such as social distancing rules and the disposal of disinfectant products throughout the office building. These health & safety measures are applied in accordance with laws and regulations adopted by the Italian government and the public health authorities at national (Ministero della salute) and regional level (Emilia Romagna Region) as well as taking due account of the guidelines of the European Centre for Disease Control (ECDC). The body temperature measurement qualifies as processing of health data, authorized in application of Article 10(2)(i) of Regulation (EU) 2018/1725 "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
- Other individuals working for EFSA (consultants, trainees, interims, experts)
- Stakeholders of EFSA, including Member State representatives
- Contractors of EFSA providing goods and services
- The general public, including visitors, correspondents, enquirers
- Relatives of the data subject
- Other categories of data subjects (please detail below)

Further details concerning the data subjects whose data are processed:

The body temperature measurement applies to everyone entering the EFSA office building, including staff and visitors.

6) Type of personal data processed (Article 31.1(c))

a) General personal data

The personal data concerns:

- | | |
|---|-------------------------------------|
| Name, contact details and affiliation | <input 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"/> |

Further details concerning the personal data processed:

The body temperature measurement is done on the spot at the entrance of the office building without any collection nor storage of data. The measurement happens by means of state-of-the-art equipment which does not record any data on the persons to whom it is applied.

7) Recipients of the data (Article 31.1(d))

- | | |
|---|--------------------------|
| Line managers of the data subject | <input type="checkbox"/> |
| Designated EFSA staff members | <input type="checkbox"/> |
| Other recipients (<i>please specify</i>): | <input type="checkbox"/> |

The measurement results into the granting of permission for office access or the denial of access for the person in question. The body temperature information is only communicated to the data subject.

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 body temperature measurement information is not stored in any way

10) Retention period (Article 4.1 (e))

N/A

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.

An on-the-spot notice is made available at the EFSA office entrance where the body temperature measurement happens. A data protection notice is available on the Intranet portal and print-outs thereof at the EFSA Reception desk.

Last update of this record: 10/06/2020

Reference: DPO/GOV/10