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| --- | --- |
|  | Record— |
|  | |
| Privacy Information Management System (PIMS) | |
| Record of processing activities – Processing Inventory Form (Template) | |

General information

|  |  |
| --- | --- |
| Type | TBD |
| Reference | GDPR-EN |
| Version | TBD |
| State | Final |
| Owner | Treatment Manager  Legal person: entity, organization (see EDPB Guidance)  [COL10] |
| Date | 22/10/2021 |
| Classification | Internal |

Document history

History of the model

|  |  |  |  |
| --- | --- | --- | --- |
| Version | Date | Author | Changes |
| 21.1 | 01/04/2022 | Mr. Aubigny | Model included in ARIANA 21.1 |

History of the form

|  |  |  |  |
| --- | --- | --- | --- |
| Version | Date | Author | Changes |
| 0.1 |  |  |  |

Approval

|  |  |  |
| --- | --- | --- |
| Name | Responsibility | Signature |
|  | Approval of the data stored in the centralized processing register. |  |
|  | Person responsible for the treatment included in this form |  |

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# Introduction

## Context e

This document is an extract from the register of processing activities duly established by each controller in accordance with Regulation (EU) of the Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of PII and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter "GDPR").

The register of processing activities, which includes all the information related to the processing activities, exists in the form of a centralized Excel table from which the information of this specific processing activity is extracted for validation and daily management.

The processing activity manager oversees the modification of this document accordingly and forwards the new version to the registry manager responsible for re-importing the information into the centralized database.

## Objectives

The purpose of this file is to:

* document all information required by the GDPR with respect to the current processing activity;
* facilitate the update process after any change in the treatment activity;
* to ensure that staff do not perform actions other than those that meet the purposes and criteria indicated in this document (respectively in the centralized register).

At a minimum, according to the GDPR, the processing register must contain:

1. *"the name and contact details of the controller and, where applicable, the joint controller, the controller's representative and the data protection officer ;*
2. *the purposes of the processing ;*
3. *a description of the categories of data subjects and the categories of personal data;*
4. *the categories of recipients to whom the personal data have been or will be disclosed, including recipients in third countries or international organizations;*
5. *where applicable, transfers of personal data to a third country or to an international organization, including the identification of that third country or international organization and, in the case of transfers referred to in the second subparagraph of Article 49(1), the documents attesting to the existence of appropriate safeguards ;*
6. *to the extent possible, the deadlines for the deletion of the various categories of data;*
7. *to the extent possible, a general description of the technical and organizational security measures referred to in Article 32(1)."*

## Application and audience

This document applies to any aspect of the processing in question. In particular, it is intended to be used by personnel involved in a processing operation, including its manager(s) to obtain their approval.

## References

DELETE WHAT IS NOT NECESSARY AND ADD NEW REFERENCES in the list of documents.

1. itrust consulting, ISMS, Security Policy (ITR-General), POL\_00-0.
2. itrust consulting, PIMS Policy, POL\_01-0.
3. itrust consulting, processing activity log, STA\_01-02.
4. REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

## Acronyms

|  |  |
| --- | --- |
| Acronym | Explanation |
| DPIA | Data Protection Impact Assessment |
| CGIE | Education Information Management Center |
| PII | Personal data |
| DPO | Data Protection Officer |
| ISD | Information Security Officer |
| DSSI | Information Systems Security Officer |
| RGPD | General Data Protection Regulation (Regulation (EU) 2016/679) |
| SMPII | Personal Data Management System |
| (Security) Control | Protection measure |
| Person (legal sense) | Person concerned |
| PII processor | PII subcontractor |
| PII controller | Person in charge of the treatment |

# Information on treatment activity

|  |  |
| --- | --- |
| Specific Processing Record Form |  |

## General

|  |  |  |
| --- | --- | --- |
| Name / Acronym | Name of the treatment  Name of the treatment  [COL7] | Acr.  An acronym (without space) of the treatment  [COL3] |
| Reference number | Id  A unique identification of the treatment in the register  [COL1] | |
| Date of creation in the register | Created on  Date of creation of the treatment  [COL188] | |
| Date of modification in the register | Amended on  Date of modification of the data of the treatment line  [COL189] | |
| Brief description | Description  An understandable description of a few lines of the treatment (not to be confused with the purpose)  [COL8] | |
| Data collected directly from data subjects | Source Collection  Indicate if the data is collected directly  [COL163] | |
| Sensitive Data | Sensitive PIIs  Calculation  [COL12] | |
| DPIA status (see §) 2.10) | DPIA  Indicate "Yes" if it exists, "No" if it is not needed, "To Do", if it is needed but has not yet been approved by the treatment decision maker.  [COL13] | |
| Transfer to third countries | TFT outside EU  Indicate "No" or describe the entity/country/purpose for a transfer outside the EU and countries with an appropriate agreement with the EU such as CH, GB...  [COL11] | |
| Persons Concerned | Categories of people involved  Concatenation of the information of the categories of persons concerned  [COL40] | |
| Other useful information |  | |

## Information on the chain of responsibility

|  |  |
| --- | --- |
| Legal liability & Criminal liability | Description of the organization or function within the organization |
| Role of the organization | Register holder role  Choose the role of the entity (Lead, Joint Lead, Subcontractor)  [COL9] |
| Processing controller | Controller  Legal person: entity, organization (see EDPB Guidance)  [COL10] |
| Joint Controller | Joint Controller  Indicate the names of the joint (most important) treatment manager or "n.a." if there are no such managers.  [COL14] |
| Other Joint controller(s) | Other Joint Controller  Indicate the names of other joint officers or "n.a." if there are fewer than 2 joint officers.  [COL15] |
| IS Manager | CTO  [COL165] |
| IS Security Manager | CISO  [COL166] |
| DPO/Responsible for notifying the CNPD in the event of a data breach. | DPO  [COL167] |
| Responsible for communicating to the data subject in the event of a data breach. | Resp. Com Subject  [COL168] |

## Purposes of the processing

|  |  |  |  |
| --- | --- | --- | --- |
| Goals | Description | The legal basis of the processing | Registration of the legal basis |
| Main #1 | Purpose 1  Describe the purpose (the most important one) with a verb in the infinitive to complete "The purpose of this processing is to..." Attention: do not indicate a description (how), nor a lawfulness ("to respect a law" is not a purpose), but only the purpose (why this law imposes this processing).  [COL17] | License 1  Put the reason for lawfulness  [COL94] | Evidence or reference 1  Briefly justify the use of the lawfulness ground  [COL95] |
| Main # 2 | Goal 2  Describe the other purposes (list of verbs separated by ;).  [COL18] | License 2  Put the reason for lawfulness  [COL97] | Evidence or reference 2  Briefly justify the use of the lawfulness ground  [COL98] |
| Secondary(s) | Secondary purpose  Describe secondary purposes in the same style (a secondary purpose is one that is not documented at the beginning of the processing, but was added later (e.g., archival purposes, scientific analyses, more detailed interpretations of a primary purpose.  [COL19] | Legality of the dry purpose.  Put the reason for lawfulness  [COL100] | Evidence or reference 3  Briefly justify the use of the lawfulness ground  [COL101] |

## Information concerning the category of personal data [PII] (art. 30.1.c)

***PCD acronym for "personal data", i.e. art 4.1 "any information relating to an identified or identifiable natural person ("data subject")".***

|  |  |  |  |
| --- | --- | --- | --- |
| Data category | | Included | Description |
| N | Common PII (Article 30.1) |  | Current personal data  Calculation  [COL21] |
| 1 | Identification information directly related to the individual  Name, marital status, etc.  Image[[1]](#footnote-1) of a person recorded by a camera |  | Civil status, id...  Put either "Yes" if the category is present in the processing or an acronym/description that specifies the processed data of that category.  [COL22] |
| 2 | Personal life (lifestyle, hobbies, family situation, etc.) |  | Personal life  Same. Habits, family situation  [COL23] |
| 3 | Information on the financial and economic situation  Income, financial situation, tax situation, etc.  Information on working conditions, etc. |  | Economic and financial information  Idem. Income, financial situation, tax situation, etc.  [COL24] |
| 4 | Information on ICT  Dynamic IP address  Connection data (IP address, logs, etc.)  Cookies when they contain a unique user ID linked to a clear personal data.  Fingerprint, unique RFID or biometric information if it does not identify the physical person but is used to log into the computer system. |  | Connection  Idem. IP addresses, logs, etc.  [COL25] |
| 5 | Direct location information  Travel information, GPS data, GSM, etc. of a natural person  WiFi location data (correlated with unique MAC address) |  | Location  Idem. travel, GPS data, GSM, Wi-Fi correlated with unique Mac address, etc.  [COL26] |
| 6 | National identification number |  | Nr. of nat. id. (art. 87)  Id.  [COL27] |
| S | Sensitive PIIs |  | Sensitive PIIs (art. 9)  Calculation  [COL28] |
| 1 | Reveal racial or ethnic origin |  | Ethnic or racial origin  Put either "Yes" if the category is present in the processing, or an acronym/description that specifies the data processed from that category.  [COL29] |
| 2 | Revealing your political opinions |  | Political views  Id.  [COL30] |
| 3 | Revealing your religious or philosophical beliefs |  | Beliefs  Id.  [COL31] |
| 4 | Revealing union membership |  | Union membership  Id.  [COL32] |
| 5 | Genetic data |  | Genetic information  Id.  [COL33] |
| 6 | Biometric data that uniquely identifies a natural person. |  | Biometric data  Id. Biometric data is used to uniquely identify a natural person.  [COL34] |
| 7 | Health information |  | Health data  Idem. health data information  [COL35] |
| 8 | Information concerning the sex life or sexual orientation of a natural person |  | Sexual life and orientation  Information on sexual life or sexual orientation  [COL36] |
| C | PIIs for criminal convictions and offenses |  | Convictions and offenses (art. 10)  Calculation  [COL37] |
| 1 | Conviction records |  | Infractions  Id.  [COL38] |
| 2 | Violation files |  | Criminal record  Id.  [COL39] |

## Information concerning the Persons concerned.

|  |  |  |
| --- | --- | --- |
| Categories Concerned Persons | Concerned | Description |
| Organizational staff |  | Organizational staff  Put either "Yes" if the category is present in the processing, or an acronym/description that specifies the data processed from that category.  [COL41] |
| Customer |  | Customers  Id.  [COL42] |
| Prospects |  | Prospects  Id.  [COL43] |
| Citizen |  | Citizens  Id.  [COL44] |
| Suppliers |  | Suppliers  Id.  [COL45] |

## Information about the recipient of the data

***Art. 4.9: "The term 'recipient' means a natural or legal person, public authority, department or other body to whom personal data are communicated, whether or not it is a third party.***

### Recipient 1

|  |  |
| --- | --- |
| Description of the recipient of the data | Destination name -1  Known name or acronym of the external recipient 1. NB: A recipient is never an entity or person internal to the processing operation, nor a subcontractor, nor a joint controller.  [COL47] |
| Recipient's country | Country -1  Its country to determine if the transfer rules outside the EU apply.  [COL48] |
| Set of data included in the processing data | Data type -1  Description of the set of PII transmitted  [COL49] |

### Recipient 2

|  |  |
| --- | --- |
| Description of the recipient of the data | Name dest-2  Natural or legal person, public authority, service that receives the communication of PII  Exception: Public authority in case of investigation)  [COL50] |
| Recipient's country | Country -2  Indicate the country for each recipient (non-EU countries should be described in e.)  [COL51] |
| Set of data included in the processing data | Data type -2  Description of the set of PII transmitted  [COL52] |

### Recipient 3

|  |  |
| --- | --- |
| Description of the recipient of the data | Destination name -3  Natural or legal person, public authority, service that receives the communication of PII  Exception: Public authority in case of investigation)  [COL53] |
| Recipient's country | Country -3  Indicate the country for each recipient (non-EU countries should be described in e.)  [COL54] |
| Set of data included in the processing data | Data type -3  Description of the set of PII transmitted  [COL55] |

## Transfer of data outside the European Union

***Art. 44:*** *"Any transfer of personal data undergoing processing or intended for processing after transfer to a third country or international organization may only take place if, subject to the other provisions of this Regulation, the conditions laid down in this chapter [Art. 45-49] are complied with by the controller and the processor... "*

|  |  |
| --- | --- |
| The processing includes transfers of data outside the EU | Third country transfer.  Calculation  [COL56] |

|  |  |
| --- | --- |
| Information/Transfer No. | Transfer 1 |
| Name of the transfer | NameTrsf-1  Transfer of PIIs to a country outside the EU and processing after this transfer  [COL57] |
| Description of the transfer | DescrTrsf-1  Description: including name and list of transferred PIIs  [COL58] |
| Lawfulness of the transfer | Lawfulness-Trsf-1  Justification for authorizing the transfer  [COL59] |

|  |  |
| --- | --- |
| Information/Transfer No. | Transfer 2 |
| Name of the transfer | NameTrsf-2  Transfer of PIIs to a country outside the EU and processing after this transfer  [COL60] |
| Description of the transfer | DescrTrsf-2  Description: including name and list of transferred PIIs  [COL61] |
| Lawfulness of the transfer | Lawfulness-Trsf-2  Justification for authorizing the transfer  [COL62] |

|  |  |
| --- | --- |
| Information/Transfer No. | Transfer 3 |
| Name of the transfer | NameTrsf-3  Transfer of PIIs to a country outside the EU and processing after this transfer  [COL63] |
| Description of the transfer | DescrTrsf-3  Description: including name and list of transferred PIIs  [COL64] |
| Lawfulness of the transfer | Lawfulness-Trsf-3  Justification for authorizing the transfer  [COL65] |

## Data retention and deletion

|  |  |  |  |
| --- | --- | --- | --- |
| Data qualification | Name of the data | Maximum retention time | Periods of deletion after a legitimate request or after the expiration of the retention period |
| Category PII maximum retention | Category. PII-1 (maximum retention)  Category PII (List) with the longest shelf life  [COL67] | Retention time max-1  Retention time (it cannot be indefinite) as well as the justification. It can also mention the exceptional retention time in case of legal proceedings.  [COL68] | Delayed deletion if legitimate 1  Process time after receiving a request (a precision can be made concerning backups).  If illegitimate, specify the reason  [COL69] |
| Critical PII category | Category. PII-2 (critical)  Category PII (List) for which the risks are the most important for the person concerned  [COL70] | Retention time max-2  Retention time (it cannot be indefinite) as well as the justification. It can also mention the exceptional retention time in case of legal proceedings.  [COL71] | Delayed deletion 2 if legitimate  Time of the process after receiving the request (a precision can be made concerning the backups).  If illegitimate, specify the reason  [COL72] |
| Other categories of PIIs | Category. PII-3 (Others)  All remaining PII categories (List) included in the treatment  [COL73] | Retention time max-3  Retention time (it cannot be indefinite) as well as the justification. It can also mention the exceptional retention time in case of legal proceedings.  [COL74] | Delayed deletion 3 if legitimate  Time of the process after receiving the request (a precision can be made concerning the backups).  If illegitimate, specify the reason  [COL75] |

## Privacy risk assessment *(rapid approach based on data categories)*

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Datasets (see 2.8) | Type of media | Probability of occurrence | Impact | Risk level |
| PII-1  (Maxi Retention)  [COL143] | Type Support PII1  Digital, paper or both  [COL144] | Likelihood PII1  Choice of a level of truth (Max)  [COL145] | Impact PII-1  Choice of an impact level (Max)  [COL146] | Risk Level PII-1  Calculation  [COL148] |
| PII-2  (Sensitive)  [COL149] | Type PII-2 support  Same as  [COL150] | Likelihood PII-2  Same as  [COL151] | Impact PII-2  Same as  [COL152] | Risk Level PII-2  Calculation  [COL154] |
| PII-3  (Others)  [COL155] | Type Support PII-3  Same as  [COL156] | Likelihood PII-3  Same as  [COL157] | Impact PII-3  Same as  [COL158] | Risk Level PII-3  Calculation  [COL160] |

## Data Privacy Impact Assessment [DPIA] (art. 35)

Art 35.1: High Risk Assessment

|  |  |
| --- | --- |
| Does the treatment pose a high risk to the individuals involved? | High Risk Assessment (Section 35.1)  Yes/No  [COL103] |
| Type of data category affected by the highest risk | Data category  Describe the category of FCI most at risk for the individual  [COL104] |
| Highest level of risk for an individual | Most critical level of risk for an individual  Choose one of the 3 corresponding risk scale proposals  [COL105] |
| Maximum number of people involved | Maximum number of people involved  Describe the approximate number of  [COL106] |
| Level of impact on privacy (Consequence for individuals) | Level of impact on privacy  Choose one of the proposals  [COL107] |

Art 35.3-4 Treatment requiring an DPIA.

|  |  |  |
| --- | --- | --- |
| Justification for the completion of the DPIA | | Conditions of the DPIA obligation (art 35.3-4)  Calculation (strict)  [COL108] |
| *The nature of the treatment met at least 2 or 3 items from the list below (see WP-248 rev.01 EDPB).* | | |
| Criteria based on the nature of the treatment | | Evaluation of criteria for treatment |
| 1 | Evaluation or scoring (including profiling and prediction) | Evaluation or rating  Evaluation or rating, including profiling and predictive activities, including "aspects of the individual's job performance, economic status, health, personal preferences or interests, trustworthiness or behavior, or location and movement"  [COL109] |
| 2 | Automated decision making with legal or similar significant effect | Automatic decision making with legal effect  Making decisions about data subjects that have "legal effects" or similar significant effects  [COL110] |
| 3 | Systematic monitoring | Systematic monitoring  Processing used to observe, monitor or control data subjects: data subjects may not know who is collecting their data and how it will be used  [COL111] |
| 4 | Sensitive or highly personal data | Sensitive data  Sensitive or highly personal data  [COL112] |
| 5 | Data processed on a large scale (taking into account the number of persons concerned, the volume of data, the duration/permanence, the geographical scope). | Data processed on a large scale  Data processed on a large scale  [COL113] |
| 6 | Matching or combining data sets | Combining data sets  Matching or combining e.g. from two or more data processing operations carried out for different purposes and/or by different data controllers  [COL114] |
| 7 | Data concerning a vulnerable person (unbalanced relationship between the data subject and the controller) | Vulnerable Persons Data  Data concerning vulnerable persons (Recital 75) (unbalanced relationship between the data subject and the controller)  [COL115] |
| 8 | Innovative use or application of new technological or organizational solutions | New technological or organizational solutions  Innovative use or application of new technological or organizational solutions  [COL116] |
| 9 | The processing prevents data subjects from exercising a right or using a service or contract | Processing that prevents data subjects from exercising a right or using a service or contract  Treatment that prevents the enjoyment of a right, service or contract  [COL117] |
| The processing operation is identified by the supervisory authority (CNPD) in the list of processing operations qualified for DPIA (see art. 35.5) | | Treatment requiring an DPIA according to the list of national authorities (article 35, paragraph 5)  Calculation  [COL118] |

Art 35.5-6 Treatment outside of DPIA.

|  |  |
| --- | --- |
| Rationale for not completing the DPIA | **Non-DPIA conditions (s. 35.5-6)**  **Calculation**  **[COL119]** |
| Reason given for non-obligation | Reason for non-obligation DPIA  Choose one of the patterns  [COL120] |
| Justification for invoking the above ground | Justification not DPIA  Briefly justify the use of the non-obligation ground  [COL121] |

Additional information about the DPIA

|  |  |
| --- | --- |
| DPIA Report | Reference to the DPIA report performed  Name of the report sent to the authority and date sent  [COL123] |
| Summary of the DPIA report (if published) | Reference to the public summary of the DPIA  Place of publication and date  [COL124] |
| Result of the CNPD consultation (before any new data processing) | Ref. notice CNPD  Summary of the notice and reference (with date)  [COL125] |

## Specific security measures for the protection of PIIs

### Organizational and technical measures (art. 32 and 40)

|  |  |
| --- | --- |
| Domain | Description or justification for not implementing |
| Encryption | Encryption  Indicate if PII are encrypted in the DB and in the communications)  [COL77] |
| Pseudonymization or anonymization | Pseudonymization  Indicate if the PII is pseudoanonymized and the method (if possible)  [COL78] |
| CIA controls and IS resilience (to protect confidentiality, integrity and availability) | CIA and resilience  Indicate the means implemented to ensure the safeguarding of the security qualities of PII (Confidentiality, Integrity and Availability)  [COL79] |
| Process for restoring availability after a physical or logical incident | Continuity after an incident  Indicate the technical means of backup in case of a disaster  [COL80] |
| Test procedure to test controls and evaluate their effectiveness. | Testing and performance  Indicate whether tests have been performed to validate security controls including restoration tests  [COL81] |
| Risk analysis according to CIA criteria | CIA risk assessment  Indicate if a risk analysis has been done  [COL82] |
| Approved [sector] Code of Conduct (s. 40) | Approved [sector] Code of Conduct (s. 40)  Indicate codes of conduct  [COL83] |
| Certification (s. 42) | Approved certification (s. 42)  Indicate security certifications  [COL84] |
| Contracts for all access to PIII and controls to ensure that all access to PIII is based on a contractual agreement that complies with the rules of the PIII Controller (consistent with the purposes of the processing). | Access to PII on explicit instruction resp. treaty (personnel contract)  Indicate the texts or procedures for proving that employees are  [COL85] |

### Other security measures not described in s. 32

|  |  |
| --- | --- |
| Domain | Description or justification for not implementing |
| ePD Directive - specific controls | ePD Directive (Art 21.5)  Indicate here all measures implemented to comply with ePD (2002/2006), in particular to receive consent (cookie, opt-in/opt-out)  [COL87] |
| Controls to ensure transparency of automatic decisions | Controls to ensure transparency of automatic decisions (Art. 21.3)  Measures to ensure transparency of automatic decisions  [COL88] |
| Implementation of PCD protection via the principle of protection by default and by design (art. 25) | Protection by default and design (Art. 25)  Indicate here the measures related to the minimization of PII in the design and development of treatment processes  [COL89] |

### Additional security measures to mitigate specific risks.

|  |  |
| --- | --- |
| Description | Measure limiting a specific risk (Art 25)  Additional measures to limit a specific risk  [COL90] |

## PII Processing Agreements

### Processor 1

|  |  |
| --- | --- |
| Name or reference | Proc1-Name  Name of one or more processors of a category of data belonging to the overall processing  [COL127] |
| Contract reference | Ref.contract 1  Contract reference  [COL128] |
| Summary of controls included in the contract | Proc1-Measures  List of measures mentioned in the contract (or reference if too long)  [COL129] |

### Processor 2

|  |  |
| --- | --- |
| Name or reference | Proc2-Names  Name of one or more processors of a category of data belonging to the overall processing  [COL130] |
| Contract reference | Ref.contract 2  Contract reference  [COL131] |
| Summary of controls included in the contract | Proc2-Measures  List of measures mentioned in the contract (or reference if too long)  [COL132] |

## Rights of the persons concerned

|  |  |
| --- | --- |
| Domain | Description |
| Indication of special rights | Identification of specific rights  List of specific rights related to the treatment  [COL134] |
| Reference to the information provided | Reference to the information provided  Reference to the information provided as well as the communication medium  [COL135] |
| Mechanism for changing or withdrawing consent | Mechanism to change or withdraw consent  Brief description and reference  [COL136] |
| Opposition to processing if legitimate | Opposition to processing if legitimate  Description of the grounds for objection and their fields/categories of data  [COL137] |
| Access, correction and overwriting mechanisms | Mechanisms to access, correct and overwrite  Description in list form/data category  [COL138] |
| PII Carrying Mechanism | PII Carrying Mechanism  Description in list form/data category  [COL139] |
| Mechanism for justifying an automated decision | Mechanism to justify an automated decision  Description in list form/data category  [COL140] |
| Other Information on the rights of the person concerned | Comment  Free  [COL141] |

## Specific treatment information

|  |  |
| --- | --- |
| S1 | S1  Description to be provided by the registrant  [COL169] |
| S1.1 | S1.1  Same as  [COL170] |
| S1.1.1 | S1.1.1  Same as  [COL171] |
| S1.1.2 | S1.1.2  Same as  [COL172] |
| S1.1.3 | S1.2  Same as  [COL174] |
| S1.2 | S1.2  Same as  [COL174] |
| S1.2.1 | S1.2.1  Same as  [COL175] |
| S1.2.2 | S1.2.2  Same as  [COL176] |
| S1.2.3 | S1.2.3  Same as  [COL177] |

|  |  |
| --- | --- |
| S2 | S2  Description to be provided by the registrant  [COL178] |
| S2.1 | S2.1  Same as  [COL179] |
| S2.1.1 | S2.1.1  Same as  [COL180] |
| S2.1.2 | S2.1.2  Same as  [COL181] |
| S2.1.3 | S2.1.3  Same as  [COL182] |
| S2.2 | S2.2  Same as  [COL183] |
| S2.2.1 | S2.2.1  Same as  [COL184] |
| S2.2.2 | S2.2.2  Same as  [COL185] |
| S2.2.3 | S2.2.3  Same as  [COL186] |

# Appendix: Encoding parameters

## Legal basis for the main purposes

|  |  |  |  |
| --- | --- | --- | --- |
| ID | Name | Legal basis (foundation or condition) | |
| N. | **For conventional PII treatments (art 9)** | | |
| N.1 | Consent | | Based on consent |
| N.2 | Contract | | Based on a contract |
| N.3 | Legal obligation | | Based on legal obligation(s) |
| N.4 | Vital interest | | Based on a vital interest for the person |
| N.5 | Public interest | | Based on a public interest mission |
| N.6 | legitimate interests | | Based on one of the legitimate interests (balancing of interests) |
| S. | **For processing of sensitive PIIs (art 10-11)** | | |
| S.1 | Explicit consent | | Based on explicit consent |
| S.2 | Labour law | | Within the framework of labour law, social security or social protection |
| S.3 | Vital interest | | To safeguard the vital interests of the person |
| S.4 | ASBL | | For a non-profit organization |
| S.5 | Public | | Obviously made public |
| S.6 | Legal defense | | In the context of defending a right in court |
| S.7 | Public interest | | Important public interest grounds, based on Union law or the law of a Member State |
| S.8 | Medical reasons | | Based on medical or related reasons |
| S.9 | Public Health | | For public health reasons |
| S.10 | Archiving, research or statistics | | For archiving, research or statistics |
| S.11 | National legislation | | Within the framework of "national" legislation, particularly in the area of genetic and biometric data, etc. |
| C. | **For treatments with special conditions** | | |
| C.1 | Journalism, art... | | For journalistic, academic, artistic or literary purposes (art. 85) |
| C.2 | Official documents | | For data included in official documents (art 86) |
| C.3 | National identification | | For national identification data (art 87) |
| C.4 | Specific requirement for archiving, research or statistics | | For archival purposes of public interest or scientific, historical or statistical research (s. 88) |
| C.5 | ePrivacy | | Based on ePD (ePrivacy Directive): DIR 2002/58/EC amended by DIR 2009/136/EC   1. Cookies 2. Traffic Data 3. Location 4. Direct marketing |
| C.10 | Specific condition for minors | | For data on children (<16 years) |

## Legal basis for secondary purposes

|  |  |  |  |
| --- | --- | --- | --- |
| ID | Name | Conditions | Legal basis (foundation or condition) |
| C.1 | Specific purposes | Eligible treatment Art 89 | For archiving purposes in the public interest, for scientific or historical research or for statistical purposes (Art 89) |
| C.2 | Consent | Description of the purpose in the consent application includes secondary processing including the description of the individual's rights | Based on initial consent |
| C.3 | National Security | Treatment to ensure:   * national security, defense, public safety * prevention and detection of criminal offenses * public policy objectives * protection of judicial independence * -prevention and detection of ethical breaches * -protection of the person * - enforcement requests civil law | Based on Article 23.1 regarding special treatment |
| P.1 | Consequential or subsequent purpose | if the following conditions are met:   * there is a link with main purpose(s) * the data controller does not oblige * the nature of the data is compatible with the processing * the consequences of the processing do not subsequently affect the data subject * - security measures are in place to protect data during processing | Processing that can be considered as a logical and/or temporal process to the initial processing with regard to the purpose |

## Impact criterion

### For the person concerned

|  |  |
| --- | --- |
| Acr. | Description of the negative consequences on the person concerned |
| Maximum | Serious or even irreversible consequences, which they will not be able to overcome (financial distress, insolvency, inability to work, long-term deterioration of physical or psychological health, death, etc.) |
| Significant | Significant consequences, which they could overcome at the cost of serious difficulties (e.g. inappropriate reallocation of funds, blocking of services by banks, damage to own property, loss of employment, legal action, deterioration of health, etc.). |
| Limited | Limited disadvantages that they will overcome despite some difficulties (additional costs, denial of access to certain services, fear, misunderstanding, stress, minor physical disruptions, etc.). |
| Negligible | Few inconveniences that they will overcome without difficulty (time wasted in re-filling information, annoyance, irritation, etc.). |

### At the treatment level

| Id. | Target | Consequence |
| --- | --- | --- |
| IP01-little-neg | 100 or 1% of the people concerned | Some easy to overcome disadvantages (time spent re-entering information, annoyances, irritations, etc.) |
| IP02-bcp-neg | > 100 and 1% of the people concerned | Few disadvantages easy to overcome (time spent re-entering information, inconvenience, irritation, etc.) |
| IP03-lim | 100 or 1% of the people concerned | Limited and easily overcome disadvantages (additional costs, denial of access to commercial services, fear, misunderstanding, stress, minor physical problems, etc.) |
| IP04-bcp-lim | > 100 and 1% of the people concerned | Limited and easily overcome disadvantages (additional costs, denial of access to commercial services, fear, misunderstanding, stress, minor physical problems, etc.) |
| IP05-less-sign | 100 or 1% of the people concerned | Significant consequences that are difficult to overcome (embezzlement, blacklisting by banks, property damage, loss of job, subpoena, worsening health condition, etc.) |
| IP06-bcp-sign | 100 or 1% < people affected <10,000 or 10%. | Important and difficult to overcome consequences (embezzlement, blacklisting by banks, property damage, loss of job, subpoena, aggravation of health condition...). |
| IP07-eno-sign | More than 10,000 or 10% of the people involved | Significant consequences that are difficult to overcome (embezzlement, blacklisting by banks, property damage, loss of job, subpoena, worsening health condition, etc.) |
| IP08-less-max | 100 or 1% of the people concerned | Serious or even irreversible consequences (financial distress such as an unbearable debt or an inability to work, long-term psychological or physical illness, death, etc.). |
| IP09-bcp-max | 100 or 1% < people affected <10,000 or 10%. | Serious or even irreversible consequences (financial distress such as unbearable debt or inability to work, long-term psychological or physical disorders, death, etc.) |
| IP10-eno-max | More than 10,000 or 10% of the people involved | Serious or even irreversible consequences (financial distress such as unbearable debt or inability to work, long-term psychological or physical disorders, death, etc.) |

1. Some images may be classified as sensitive data if they identify certain sensitive information such as religious or philosophical beliefs, sexual orientation, etc. [↑](#footnote-ref-1)