

Cedefop record of processing activity

Record of Cedefop activities processing personal data, 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 1247/2002/EC.

Nr.	Item	Description
Requests for public access to documents		
1.	Last update of this record	03/02/2023
2.	Reference number	CDFNOT110 - Requests for public access to documents
3.	Name and contact details of controller	<p><u>Cedefop – European Centre for the Development of Vocational Training</u> Postal address: Cedefop Service Post, Europe 123, 570 01 Thermi, GREECE Telephone: (+30) 2310-490111 Email: info@cedefop.europa.eu</p> <p>Responsible department or role: Department for Communications: info@cedefop.europa.eu</p>
4.	Name and contact details of DPO	data-protection-officer@cedefop.europa.eu
5.	Name and contact details of joint controller (where applicable)	N/A
6.	Name and contact details of processor (where applicable)	<ul style="list-style-type: none"> • DCM – Info service • Designated Cedefop staff (when request involves documents handled by them) • Cedefop’s Legal Function (when request involves a legal matter);
7.	Very short description and purpose of the processing	<p>Processing of personal data is necessary for handling document access requests received by Cedefop and for providing access to the requested documents to the requester in accordance with Regulation (EC) No 1049/2001.</p> <p>This right to access concerns documents held by Cedefop, i.e. documents drawn up or received by it and in its possession.</p> <p>Cedefop strives to provide the public with the widest possible access to documents held by it through its website. If citizens cannot find a document on</p>

		<p>Cedefop's website, they can use the following document request form to request access to it: Requests for access to documents (Cedefop web portal). The document request form in the Cedefop web portal simply sends an email to info@cedefop.europa.eu (it does not store data anywhere).</p> <p>Requesters can also send their written requests directly to the following email address: info@cedefop.europa.eu</p> <p>DCM receives the requests for public access to documents. Requests are logged, an acknowledgement of receipt is sent, and DCM forwards the request to the appropriate department, service and/or staff member.</p> <p>When a request is for a document which is publicly available, DCM normally replies directly to the requester.</p> <p>When a request affects a legal matter or case, the request is forwarded to Cedefop's Legal Function who either replies directly to the requester or provides the answer to DCM to be sent out.</p> <p>If a request is received directly by the Legal Function or members of the Director's office and affects a legal matter, it is assessed, logged and responded to directly by the Legal Function. Otherwise, it is forwarded to DCM to be processed.</p>
8.	Description of categories of persons whose data is processed and list of data categories	<p>Categories of data subjects:</p> <ul style="list-style-type: none"> • Requesters: citizens of the European Union and natural or legal persons residing or having their registered office in an EU Member State; • Authors of documents requested (when their personal data appears on the documents requested) • Individuals mentioned or cited in the requested documents <p>Categories of data:</p> <p>Requester's data:</p> <ul style="list-style-type: none"> • Document(s) requested • Description (file number, comments, etc.) • Last name • First name • Organisation • Email address • Country

		<p>Authors of and/or individuals mentioned or cited in the requested document:</p> <ul style="list-style-type: none"> Categories of data depend on the document requested, but generally includes name and/or contact details. DPO is consulted when disclosure of document could affect privacy of third parties.
9.	Time limit for keeping the data	The file (including the request, the response, any related correspondence and all supporting documentation) will be stored in Cedefop's records bank for two years after the closure of the case, or as long as Cedefop is under a legal obligation to do so.
10.	Recipients of the data	<ul style="list-style-type: none"> Records manager and/or designated records bank correspondent (only receives identification of documents requested); Data Protection officer (receives only documents requested when they include personal data of third parties); When necessary, access to the personal data may be granted also to internal or external authorized staff in public authorities or audit control or investigation bodies such as: Cedefop Internal Control, external legal contractor, external audit contractors, Court of Auditors, Internal Audit Service of the European Commission, European Anti-Fraud Office (OLAF), European Ombudsman, the European Data Protection Supervisor, the General Court or the European Court of Justice.
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	N/A
12.	General description of security measures where possible.	<p>Cedefop implements appropriate technical and organisational measures to safeguard the security of personal data and ensure the confidentiality, integrity and availability of the relevant systems, services and the personal data processed within them.</p> <p>In particular,</p> <ul style="list-style-type: none"> Documents are stored electronically on a secure network in Cedefop's relevant systems such as the electronic records management system (Records Bank); Cedefop's ICT monitors, enhances and safeguards the security of all networks, servers,

		<p>software and information systems following Cedefop's ICT Use and Security Policy;</p> <ul style="list-style-type: none"> • Access to Cedefop's systems is strictly limited to authorised staff and protected through authentication (username/password); • Paper documents are stored and kept securely Cedefop's Archive; • Access to personal data is protected granted on a "need to know" basis.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	Privacy statement available on the Cedefop web portal and linked to from the document request form.