



## **Data Protection EEAS Annual report 2011**

The EEAS was created 1 January 2011. In the first place, the EEAS has concentrated its efforts on ensuring as much business continuity as possible, continuing on applying rules and procedures from the Commission and the Council, while preparing and adopting its own internal rules.

In that period, contacts were taken with the DPOs of the Commission and the Council who handed over the notifications of ongoing data processing operations falling under the scope of the EEAS.

### **I – Reference texts – implementing rules adopted**

A draft text of the implementing rules for the EEAS of Regulation 45/2001 was prepared in April 2011. It was sent to the Commission and to the EDPS in July. The EDPS sent its comments and green light mid October. The High Representative adopted the implementing rules on 8 December 2011, they entered into force in the EEAS subsequently.

### **II – Staffing matters**

Following the adoption of the data protection implementing rules for the EEAS, a DPO was appointed on 8 December 2011 for a period of 5 years.

An AST post has been published to recruit an assistant in the field of data protection. The recruitment will take place early 2012.

### **III – Organisation matters**

Following the adoption of the data protection implementing rules for the EEAS, a data protection coordinators (DPC) network is under construction. Managing directors and heads of services have been asked to nominate one colleague per entity by 20 December.

Each DPC will be asked to establish an inventory of all data processes performed in his/her Directorate/service. The coordinators will also be in charge of verifying that a notification exists for each item on their inventory.

The legal division will provide legal support to the DPO in all matters requiring legal advice; a focal point in the legal division and a contact in managing directorate human resources have been identified for this purpose.

#### **IV – Technical and electronic supports**

A functional mailbox has been created.

As the EEAS has an obligation to make all notifications public (with a few exceptions), a sub-website on data protection for the internet and for the intranet of the EEAS is under construction to support, among other things the public register. These two sub-websites will also host the inventory, the notification and privacy statement templates, the best practices and some guidelines on each actor's rights and obligations.

Meanwhile, the DPO keeps all new notifications in paper version and has created an Excel file to list them electronically.

EEAS IT department has designed and will manage the construction of the electronic register part of the project ("e-DPO"), which will enable the data controllers to enter their notifications under guidance and scrutiny of the DPO. The system of the EEAS will be based on the one in use in the Council, which is well adapted to our needs.

The Council has given its green light for the EEAS to copy its system. However, the programming languages used in the Council and in the Commission being different, a translation/adaptation work is necessary.

A first vision document, still subject to changes, has been agreed. Its current estimated timeline goes as follows:

<b>Phase</b>	<b>End-date</b>	<b>Main subject</b>
Inception	06/10/2011	e-DPO Vision document
Elaboration	30/10/2011	e-DPO Functional Requirements baseline
Construction	09/01/2012	e-DPO System
Transition	04/2012	Testing/Training/Roll to Production
Full launch	06/2012	System available to notifications authors

#### **V – Communication**

An internal communication plan is under way with the Strategic communication unit. The aim is to raise awareness within the EEAS around data protection. This already includes the following projects:

- The construction of the sub-website on the intranet (finalisation is expected for beginning of 2012, depending on IT department's availability),
- The construction of a visual identity for data protection (including a logo and the creation of a data protection avatar to make data protection friendlier and more approachable),
- A communication campaign around data protection on the EEAS intranet (a teaser campaign composed of several episodes is envisaged so as to overcome the current very short lived visibility of items published of the home page of the intranet).

Foreign Policy Instrument (FPI) is coordinating the creation of the data protection pages to be hosted on the EEAS internet. These should go public by the end of the year, provided the data protection logo is ready.

## **VI – Next steps for 2012**

### **Network of data protection coordinators**

An EEAS data protection coordinators network is being set up and consolidated. A first meeting is scheduled for end of January.

### **Inventory**

The first task of the data protection coordinators will be to establish an inventory of data processes within the EEAS so as to identify recurrent processing operations and need for corporate notifications. The inventory will also help identify priority areas where data protection needs to be reinforced and serve as a tool to evaluate our growing conformity with data protection when comparing it with the corresponding notifications.

### **Raising awareness - communication**

Training sessions will be put in place together with the training unit so as to form the new coordinators and controllers on the one hand, and the potential data processors on the other hand. A 3<sup>rd</sup> kind of training will be considered to make managers aware of their roles and duties when it comes to processing data.

An awareness campaign is being designed with the communication strategy team. It encompasses, among other, a quiz on personal data and its protection to be published on the intranet on 28 January 2012, European day for data protection. EDPS is providing the EEAS DPO with 3 usb keys to be awarded as prizes. A logo and an avatar are also being designed so as to enhance colleagues' recognition of data protection matters.

Consideration is being given to the production of promotional material so as to turn an abstract subject into something people can hold/touch, an appropriate budget line needs to be identified.

### **Tools**

Templates are being created for model notifications and model privacy statements. HR and Budget are two obvious candidates for such templates.

A tool kit will be put together in the first semester so as to help/guide users.

Ingrid Hvass,  
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Brussels, 20 December 2011.