



RECORD OF PROCESSING ACTIVITIES

Record of processing activities with administrative personal data based on Article 31 of Regulation 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies applicable to Europol in accordance with Article 46 of the Europol Regulation
Part I – Public Information

Q1	Last Update of the record	25 March 2021
Q2	Reference number	EDOC #1149877
Q3	Data controller <i>Contact details</i>	Governance Directorate Head of G5 Security <i>G5@europol.europa.eu</i>
Q4	Data Processor (if applicable) <i>Contact details</i>	<u>Contractor:</u> Insight Technology Solutions Belgium Romeinsesteenweg 468 1853 Grimbergen Belgium, VAT number BE0464228241 <u>Subcontractor:</u> NTT Limited Dimension Data House Waterfront Business Park Fleet Road Fleet, Hampshire GU51 3QT United Kingdom
Q5	Joint controller (if applicable) <i>Contact details</i>	Not applicable
Q6	Data Protection Officer	<i>dpo@europol.europa.eu</i>
Q7	Name of processing activity	Calls recording of general Europol phone number

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<p>Q8</p>	<p>Purpose of processing</p>	<p>Europol has a need to record calls to the general Europol phone number, and to retrieve, play back, store and share these call recordings.</p> <p>The purpose of this data recording is to allow G5 Security to reconstruct situations in order to obtain relevant information regarding potential threats or incidents related to safety and security communicated via telephone to Europol. The recorded material and the related traffic data are used for further analysis, investigations or evaluations.</p>
<p>Q9</p>	<p>Data categories</p>	<p> <input checked="" type="checkbox"/> Name <input type="checkbox"/> Address <input type="checkbox"/> Date of birth, <input type="checkbox"/> Place of birth <input type="checkbox"/> ID/ passport no. <input type="checkbox"/> Marital status <input type="checkbox"/> Gender <input checked="" type="checkbox"/> Email address <input checked="" type="checkbox"/> Phone no. <input type="checkbox"/> Name employer <input type="checkbox"/> Personnel number <input type="checkbox"/> Function </p> <p>Other (please, specify): Date, time, duration and content of the conversation</p> <p>Specifically, the following data is extracted from the phone call:</p> <ul style="list-style-type: none"> • Telephone number of the caller • Date • Time • Content of the conversation • Call duration <p>In addition, in the specific case of business users that need to access the Call Recording Application, a minimum of information is also needed:</p> <ul style="list-style-type: none"> • User email address • User name
<p>Q10</p>	<p>Description of categories of persons</p>	<p> <input checked="" type="checkbox"/> Europol - All Staff <input checked="" type="checkbox"/> Europol - Contractors <input checked="" type="checkbox"/> Europol - Law Enforcement Officers <input checked="" type="checkbox"/> Europol - Liaison Officers <input checked="" type="checkbox"/> Europol - Seconded National Experts <input checked="" type="checkbox"/> Europol - Task Force Officers <input checked="" type="checkbox"/> Europol - Trainees & Interns <input checked="" type="checkbox"/> Others: </p> <p>Any individual calling to the general Europol phone number</p>

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<p>Q11</p>	<p>Time limit for keeping the data</p>	<p>Currently, this is defined as 7 days "Recording of general phone number - Use and Management Policy". However, it is configurable.</p> <p>The solution automatically removes the call recordings after the configurable number of days defined above (First-in-First-out principle).</p> <p>In case a call is marked as "not to be deleted", the system has been configured to store these calls for 20 years. G5 security will review on regular basis (monthly) the necessity of having the recordings still available.</p>
<p>Q12</p>	<p>Recipients of the data</p>	<p>The telephone operators at Main Reception (C2-01 Facilities) or Plaza (C2-01 Facilities) answers the incoming calls during office hours. After office hours, weekends and Europol holidays, the incoming calls are answered by the Security Guard in the Security Control Room (G5 Security).</p> <p>The data stored per each phone call (content of the conversation, date, time, call duration and telephone number of the caller) are accessible by G5 Security.</p> <p>The responsibility for the overall proper management of the general phone number recording system shall rest with the Head of Unit G5-1.</p> <p>The data may be transferred to the following third parties after having obtained the written approval of the Executive Director or the Security Coordinator:</p> <ul style="list-style-type: none"> a) Judicial and law-enforcement authorities of the Netherlands in accordance with the Dutch law <p>Third parties if the transfer of data is necessary or legally required on important public interest grounds, or for the establishment, exercise or defence of legal claims</p>
<p>Q13</p>	<p>Transfer to third countries or international organisations</p>	<p><input checked="" type="checkbox"/> NO</p> <p><input type="checkbox"/> YES:</p>
<p>Q14</p>	<p>General description of security measures</p>	<p>Authentication of application users is based on two-factor authentication.</p> <p>Information stored and data transferred is encrypted.</p>

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		<p>Audit logs are created when a user makes a change in Calabrio.</p> <p>Recordings are automatically removed after a configurable number of days (retention period).</p>
<p>Q15</p>	<p>How data subjects can exercise their rights to access, rectification, object and data portability (where applicable)</p>	<p><i>Callers:</i></p> <p>In line with data protection recommendations, the Calls Recording solution will play a message to the caller at the start of the phone call, stating that the call is going to be recorded for security reasons.</p> <p><i>Application users:</i></p> <p>They are informed about the Calls Recording solution, its functionalities and the personal data processed in coordination with the DPF by:</p> <ol style="list-style-type: none"> 1) targeted trainings, briefings and email messages; 2) a Privacy Notice, Use Policy and extract of the Record of Processing Activities; 3) a Business User Guide; <p><i>Both, callers and application users:</i></p> <p>The data subject can request access and/or deletion of his/her personal data from the Calls Recording solution at any time.</p> <p>The data subject can exercise their rights by sending an e-mail to the Europol data controller: G5@europol.europa.eu.</p>

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Part II - Compliance check and risk screening (internal)

<p>Q16. Legal basis</p> <p>Article 5 of Regulation 2018/1725</p> <p><i>Please, indicate which ones are applicable.</i></p>	<p><input checked="" type="checkbox"/> Processing is necessary for the performance of a task carried out in the public interest on the basis of EU law (Europol Regulation or other legal instruments).</p> <p>Please specify task: recording the calls to the general Europol phone number and retrieving, playing back, storing and sharing these call recordings.</p> <p><input type="checkbox"/> Processing is necessary for compliance with a legal obligation to which the controller is subject.</p> <p>Please specify legal basis:</p> <p><input type="checkbox"/> Processing is necessary for the performance of a contract to which the data subject is party</p> <p>Please specify contract:</p> <p><input type="checkbox"/> The data subject has unambiguously given his or her free and informed consent.</p> <p>Please specify how consent is given:</p> <p><input type="checkbox"/> Processing is necessary in order to protect the vital interests of the data subject or of another natural person.</p> <p>Please specify vital interests:</p>
<p>Q17. Necessity of processing</p> <p><i>How do you establish that all data items you plan to collect are necessary?</i></p>	<p>The purpose of the recording is to be able to adequately handle threats or incidents related to safety and security communicated via telephone to Europol, in order to decide on the nature of the threat, emergency or incident, which allows for the appropriate and immediate security measures to be taken.</p> <p>In such a case, it is advisable to share the most complete information possible with the authorities. As a minimum, it must include the following data extracted from the phone call:</p> <ul style="list-style-type: none">• Telephone number of the caller• Date• Time• Content of the conversation

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	<ul style="list-style-type: none"> • Call duration <p>In addition, in the specific case of business users that need to access to the Call Recording Application, a minimum of information is also needed:</p> <ul style="list-style-type: none"> • User email address • User name
<p>Q18. Data accuracy</p> <p><i>How do you ensure that you process accurate data?</i></p> <p><i>Do you review the data?</i></p>	<p>All data is automatically gathered and stored by the solution. Therefore, no manual manipulation of the data is performed previous to its storage.</p> <p>In the event of a call referring to or related to a threat, emergency situation or any other incident, it will be reviewed (replayed) by the Head of Unit G5-1 in the presence of team leader of G5-11 Physical Security or another appointed G5 Security official to safeguard the “four ears” principle. The Head of Unit G5-1 shall determine whether the replayed recording needs to be extracted for further analysis, investigation or evaluation.</p>
<p>Q19. Means of storage</p> <p><i>Please, indicate which one is applicable.</i></p>	<p><input checked="" type="checkbox"/> Electronic</p> <p>All recorded calls and traffic data are electronically stored in Calabrio. The Use Policy and the User Guide provide guidance for how long the calls recordings shall be kept in the solution and how and when these can be transferred from Calabrio to any third parties.</p> <p>Users’ profiles, i.e., personal data of users (User Name and email address) is stored as part of their accounts in Calabrio. This data is actually retrieved from AD and as such is also available in other Europol systems, such as IRIS, Outlook, etc. The users’ profiles are created and deleted by the company administrator.</p> <p>Activities by users are automatically captured and stored by Calabrio audit trail reporting system in the Audit Trail Table.</p> <p><input type="checkbox"/> Paper based</p> <p>Please, specify</p>
<p>Q20. Storage for historical, statistical or scientific purpose</p> <p><i>Please, indicate which one is applicable.</i></p>	<p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes, only non-personal data</p> <p>Please, specify:</p>

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	<input type="checkbox"/> Yes, including personal data Please specify legal basis:
<p>Q21. Transparency: how do you inform people about the processing. <i>Please, indicate which one(s) is applicable.</i></p>	<input checked="" type="checkbox"/> Privacy Statement – a Privacy Notice to be published on IRIS; <input checked="" type="checkbox"/> Information published on IRIS – communication to all staff announcing the launch of the new service; <input checked="" type="checkbox"/> Information provided via e-mail - targeted email message to users who are going to use the Calls Recording solution <input checked="" type="checkbox"/> Other, please specify: <ol style="list-style-type: none"> 1. A Use Policy to be approved and published in Vademecum IRIS page (there is already one which should be updated #874831) 2. A Business User Guide (under creation) to be linked to the targeted communication; 3. By playing a message to the caller, at the start of the phone call that the call is going to be recorded for security reasons.
<p>Q22. More detailed description of security measures</p>	<p>Each solution infrastructure component will be installed in a dedicated VLAN and the traffic will be controlled by the network firewall.</p> <p>Authentication of application users is based on two-factor authentication, and only users who are allowed to can access the solution.</p> <p>Calls Recording application provide a set of audit trail reporting. When a user makes a change in Calabrio, Calabrio automatically adds an entry to the Audit Trail Table to capture and store what the user did and what part was affected.</p> <p>Information stored and data transferred is encrypted.</p> <p>The solution is able to encrypt data in transit and rest. Once the call is extracted from the system to the user’s PC, the user can protect it with a password to prove that the file is authentic and has not been manipulated.</p> <p>The solution automatically removes the call recordings after a specific number of days (retention period). Retention period is configurable (current value is 7 days).</p>
	Does this process involve any of the following?

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Q23. High risk identification

Please, indicate which one(s) is applicable.

Where applicable, please, provide links to threshold assessment and if applicable to DPIA

data relating to health, (suspected) criminal offences or otherwise considered sensitive ('special data categories');

Any threat, emergency situation or any other incident and in particular in case of:

- a) Bomb threats
- b) Threats against Europol staff or Europol as an organization
- c) Threats against other persons or entities
- d) Whistleblowing
- e) Calls that cannot be fully understood and where there are reasonable grounds for believing that it refers to or is related to a threat, emergency situation or any other incident

evaluation, automated decision-making or profiling;

monitoring data subjects;

new technologies that may be considered intrusive