



**RECORD**  
**of processing activity**  
**according to Article 31 Regulation 2018/1725**

**NAME of data processing:**

Relocation Services

**Last update: August 2020**

1) Controller(s) of data processing operation (Article 31.1(a))

- Controller: Organisational entity of Fusion for Energy (F4E)  
Unit / Department **responsible** for the processing activity: HR Unit
  - Contact: [HR-DataProtection@f4e.europa.eu](mailto:HR-DataProtection@f4e.europa.eu)
- Data Protection Officer (DPO): [DataProtectionOfficer@f4e.europa.eu](mailto:DataProtectionOfficer@f4e.europa.eu)

2) Who is actually conducting the processing? (Article 31.1(a))

The data is processed by F4E (responsible unit) itself .....

The data is processed by a third party (e.g. contractor) (Art. 29 – Processor) : .....

Contact point at external third party (e.g. Privacy/Data Protection Officer):

1) Barcelona Relocation Services :

The data is processed by the F4E HR unit and by BRS (Barcelona Relocation Services, hereafter the Processor in Barcelona) via the [Framework Contract for the Provision of Relocation Services to Fusion for Energy - F4E-AMF-0710.01](#) (F4E\_D 25MK93).

Processor's contact point:

Processor's Privacy Policy:

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In respect of the service providers, the F4E-AMF-0710.01 contract signed with Fusion for Energy includes a clause on the necessary respect of data protection issues (Article II.9. Processing of personal data).

2) Cadarache Relocation Services :

The data is processed by F4E HR Unit and by Agence Iter France (hereafter the Processor in Cadarache) through the following agreement: [CONV-AIF-2009-2-35 Site Support Agreement IO-CEA signed on 18 November 2009](#). The Processor has a contract with the relocation service provider Executive Relocations.

Processor's contact point:

[Processor's Privacy Policy](#)

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### 3) Purpose and Description of the processing (Article 31.1(b))

*Why is the personal data being processed? Specify the underlying reason for the processing and what you intend to achieve. Describe, summarise the substance of the processing.*

*When you (later on) intend to further process the data for another purpose, please inform the Data Subject in advance.*

#### 1) F4E and Barcelona Relocation Services:

Personal data are used to provide various services related to relocation assistance to F4E staff members assigned to Barcelona and who have to change their place of residence upon their taking up duties in order to comply with Art. 20 of the Staff Regulations. Staff members interested in using the relocation services send their request form via e-mail to the F4E HR responsible officer who then sends it to the relocation agency along with the order form. The agency contacts the staff member and proposes him/her to visit a certain number of flats.

When the process is over, the request forms and the evaluation reports completed by the users of

the service are then processed for validating the invoices received from the relocation agencies and in order to monitor the quality of the services provided.

## 2) F4E and Cadarache Relocation Services:

The data is used to provide relocation assistance to F4E staff members assigned to Cadarache who were living more than 100 km away from the ITER location at the moment of recruitment and who have to change their place of residence in order to comply with Art. 20 of the Staff Regulation - within 6 months of their taking up duties. The staff member interested in using the relocation services sends their request form via e-mail to the F4E HR responsible officer who then sends it to the ITER France Agency who then forwards the request to the relocation agency. The agency contacts the staff member and proposes him/her to visit a certain number of flats.

When the process is over, the request forms are then processed for validating the invoices received from the ITER France Agency for the provided relocation services.

## 4) Lawfulness of the processing (Article 5(a)–(d)):

*Mention the legal bases which justifies the processing*

Processing necessary for:

- (a) performance of tasks in the public interest attributed by EU legislation (including management and functioning of F4E) .....
- Council Decision of 27 March 2007 “establishing the European Joint Undertaking for ITER and the Development of Fusion Energy and conferring advantages upon it” - 2007/198/ Euratom, as last amended by Council Decision of 22 February 2021 (2021/281 Euratom), O.J. L 62, 23.02.2021, p.8, in particular Article 6 thereof;
  - Statutes annexed to the Council Decision (Euratom) No 198/2007 “establishing the European Joint Undertaking for ITER and the Development of Fusion Energy and conferring advantages upon it”, as last amended on 22 February 2021, in particular Article 10 thereof;
  - [Staff Regulations of Officials \(SR\) and the Conditions of Employment of Other Servants of the European Communities \(CEOS\), in particular Article 20.](#)
  - [CONV-AIF-2009-2-35 Site Support Agreement IO-CEA signed on 18 November 2009.](#)
  - [Framework Contract Provision of Relocation Services to Fusion for Energy Staff - F4E-](#)

[AMF-0710.01](#)

- (b) compliance with a *specific* legal obligation for F4E to process personal data .....
- (c) necessary for the performance of a contract with the data subject or to prepare such a contract .....
- (d) Data subject has given consent (ex ante, freely given, specific, informed and unambiguous consent) .....

The service is provided at the request of the staff member. When signing the request, the staff gives consent.

## 5) Description of the data subjects (Article 31.1(c))

*Whose personal data is being processed?*

Staff members of Fusion for Energy assigned to Barcelona or Cadarache, who request the service and their family members living with him/her.

## 6) Categories of personal data processed (Article 31.1(c))

*Please give details in relation to (a) and (b). In case data categories differ between different categories of data subjects, please explain as well.*

(a) **General personal data:**

F4E and Barcelona Relocation Services:

- Staff Member : Name, surname, nationality, spoken languages, address, telephone number, e-mail, number of children, number of pets, services requested (house search assistant, helpdesk, school search assistant).
- Spouse of staff member: name and surname.

Cadarache Relocation Services :

- Staff Member: Name, surname, nationality, gender, telephone number, e-mail, marital status, length of new contract, starting date of new contract, date of arrival in France.
- Staff member's family members: name and surname

(b) **Sensitive personal data** (Article 10)

Not applicable.

### 7) Recipient(s) of the data (Article 31.1 (d))- Who has access to the personal data?

*Recipients are all people to whom the personal data is disclosed (“need to know principle”). Not necessary to mention entities that may have access in the course of a particular investigation (e.g. OLAF, Court, EDPS).*

The following recipients have access to the personal data processed:

#### Barcelona Relocation Services:

- Process owner: Head of HR Unit
- Dedicated Staff of the Human Resources Unit,
- Head of Administration,
- F4E finance officer,
- The third party, processor: relocation company,
- ICT Officer responsible for the dedicated database, if necessary for technical support
- IDM manager, if necessary for support

#### Cadarache Relocation Services:

- Process owner: Head of HR Unit
- Dedicated staff of the Human Resources Unit
- Head of Administration,
- F4E finance officer,
- The third party, processor: ITER France agency
- F4E Director,
- IDM Manager, if necessary for support,
- ICT Officer, responsible for the dedicated database, if necessary for technical support.

Also, only if appropriate and necessary for monitoring or inspection tasks, access may be given to: e.g. F4E Director, DPO and Anti-Fraud & Ethics Officer, Head and/or responsible officer of LSU, IAC, IDOC.

### 8) Transfers to third countries or International Organizations (Article 31.1 (e))

*If the personal data is transferred outside the EU, this needs to be specifically mentioned, since it increases the risks of the processing operation (Article 47 ff.).*

Data is transferred to third countries or International Organizations recipients:

1) Yes.....

In the case of Cadarache, data is transferred to Agence Iter France

2) No .....

In the case of Barcelona relocation services

If yes, specify to which country/IO:

France

If yes, specify under which safeguards and add reference :

- Adequacy Decision (from the Commission) .....
- Memorandum of Understanding between public authorities/bodies .....
- Standard Data Protection Clauses (from the EDPS/Commission).....
- Binding Corporate Rules .....
- Others, e.g. contractual/agreements (subject to authorisation by the EDPS).....
- Reference:

**9) Technical and organisational security measures (Articles 31.1(g) and 33)**

*Please specify where the data is stored (paperwise and/or electronically) during and after the processing. Specify how it is protected ensuring “confidentiality, integrity and availability”. State in particular the “level of security ensured, appropriate to the risk”.*

Security measures are implemented to ensure integrity, confidentiality and availability of information. The default provisions include backups, centralized logging, software updates and continuous vulnerability assessment and follow-up. Specific provisions resulting from the characteristics of the information system may lead into the implementation of encryption, two factor authentication among others found relevant following a risk analysis.

#### 10) Retention time (Article 4(e))

*How long is it necessary to retain the data and what is the justification for this retention period? If appropriate, differentiate between the categories of personal data. If the retention period is unknown, please indicate the criteria for determining it.*

The data shall be kept by the HR unit for one year after the relocation service has been provided.. The data may be kept longer for financial management purposes and the related retention periods are established in the dedicated [contract management record](#).

Fusion for Energy may continue to store Personal Data for a longer period, as may be necessary for internal auditing and for the establishment, exercise or defense of legal claims until such claims are finally resolved.

#### 11) Information/Transparency (Article 14-15)

*Information shall be given in a concise, transparent and easily accessible form, using clear and plain language.*

A Privacy Notice on the provision of Relocation services has been established (F4E\_D\_2MA5RH) and published on the F4ENet in the respective HR section and in the [Data Protection Register](#), providing the information required under Articles 15 and 16 of the 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 No 1247/2001/EC.

The Privacy Notice is also published on the F4E webpage. A dedicated page on the relocation services offered by F4E is available in the HR intranet section.