**PRIVACY STATEMENT FOR
INVOICING FOR PRIVATE USE OF SERVICE GSMs
(OLAF DPO-40)**

1. DESCRIPTION OF THE PROCESSING OPERATION

OLAF provides selected staff with mobile phones, in the interest of the service. A SIM card, together with a mobile phone, is attributed to the OLAF staff members following a request from his/her manager. The data is sent to Mobistar so that the SIM card can be activated.

An excel file is maintained containing the name of the OLAF staff member, the SIM card number attributed to him/her, and the mobile phone number. The table is stored at N:\DIRD\COMMON\COMMON\GSM. The OLAF Helpdesk also has access to the table, which it uses in relation to the login.

OLAF staff members who have received a service GSM will be billed for all private calls. "CALL" is an information system used by OLAF for monitoring the records of mobile telephone calls made. In accordance with the Financial Regulation and based on the records of calls made, CALL makes it possible to check the invoices submitted by OLAF's supplier, and to allow the users to designate private calls. The data collected is stored in the CALL database. CALL has a relational database on OLAF's IT-servers, with individual access via a personal URL made known to the user in a personal e-mail. CALL allows users to consult a detailed record of their business and private calls, then designate individual calls or groups of calls as either Work or Private. Users can save or print their own call data.

The legal basis for this processing operation is articles 21, 27 of the Financial Regulation.

2. WHAT PERSONAL INFORMATION DO WE COLLECT, FOR WHAT PURPOSE, AND THROUGH WHICH TECHNICAL MEANS?

The following personal data are collected: telephone number, SIM number, name, first name, personnel ID number (NUP), country called, number called, date and time of call, duration of call, cost of call.

The purpose for which this information is collected is to manage the attribution of service GSMs and SIM cards, and to identify callers and their mobile phone number, which enables the operational service to link a user to a telephone number. OLAF uses the CALL application to manage mobile telephony by facilitating the billing of private calls carried out on service mobile phones.

3. WHO HAS ACCESS TO YOUR INFORMATION AND TO WHOM IS IT DISCLOSED?

Access to the private data in your file is restricted to the data subject and the person in OLAF's personnel unit responsible for management of service GSMs and in OLAF's budget unit who has been assigned as responsible for the CALL application and has access to the data for correction, modification and deletion.

4. HOW DO WE PROTECT AND SAFEGUARD YOUR INFORMATION?

In order to protect your personal data, a number of technical and organisational measures have been put in place. Concerning unauthorised access to equipment and data, the OLAF secure premises, protected by OLAF-specific physical security measures, host all hardware; network firewalls protect the logic perimeter of the OLAF IT infrastructure; and the main computer systems holding the data are security hardened. Administrative measures include the obligation of all personnel having access to the system to be security vetted, and service providers maintaining the equipment and systems to be individually security cleared and to have signed non-disclosure and confidentiality agreements.

5. HOW LONG DO WE KEEP YOUR DATA?

The data is kept on the Excel spreadsheet as long a mobile phone is attributed to the staff member.

The billing data can be viewed for six months. Once the data for the seventh month has been loaded, that for the first month is deleted. Calls that have not been designated are deemed "private" and the costs will be deducted from your next payment.

6. HOW CAN YOU VERIFY, MODIFY OR DELETE YOUR INFORMATION?

You have the right to access the personal data we hold regarding you and to correct and complete them. Upon request and within three months from its receipt, you may obtain a copy of your personal data undergoing processing. Any request for access, rectification, blocking and/or erasing your personal data should be directed to the Controller (olaf-fmb-data-protection@ec.europa.eu). Exemptions under Article 20 (1) (a) and (b) of Regulation 45/2001 may apply.

7. RIGHT OF RECOURSE

You have the right to have recourse to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation 45/2001 have been infringed as a result of the processing of your personal data by OLAF.