

March 2012

**PRIVACY STATEMENT FOR
OLAF DOCUMENT MANAGEMENT SYSTEM (THOR)
(OLAF DPO-168)**

1. DESCRIPTION OF THE PROCESSING OPERATION

Thor is an application by which OLAF registers official documents relating to investigations. The application is composed of a series of modules; document repository, registration, OCR and full text indexing, search, filing, workflows, user/person/entity management and auditing.

The criteria for registration of a document are laid out in the Commission decision 2002/47. In principle all documents should be registered that:

- are received or formally drawn up by a Commission department in the course of its activities; and
 - (1) are likely to require an action, follow-up or a reply from the Commission or one or more of its departments; or
 - (2) involve the responsibility of the Commission or one of its departments; and
- contain information which is not short-lived.

Documents that are drawn up as effective administrative or legal evidence of decisions, situations, intentions or events linked to the activities of the Commission or its departments must also be registered.

In this context we make no distinction between a document and a record. The two words are used interchangeably.

Thor processes personal data and is therefore subject to the EC regulation 45/2001. This document explains in which way Thor manages the data while ensuring the confidentiality.

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

The information collected is divided in two groups:

At the level of the descriptive data (metadata) of the document, the personal data which is collected and processed is divided in two categories:

- People working for the Commission. The data is taken from the COMREF database. The data collected is firstname, lastname, net1 logon name, email address, telephone extension, Unit / DG, office location, function/post, acting function for persons having more than one function, modifying date of the record.
- Persons external to the Commission (other EU institutions, public organisations, private organisations). The data is collected, stored and processed in a separate database managed by Thor. The data stored is title, first name, last name, box number, address, city, postcode, country, e-mail, internet address, building, floor, office. Only the field first name and last name are compulsory.

The purpose of document management and in particular the registration of documents is to have an official trace of official correspondence between the Office and its stakeholders, improve the quality of service, preservation of the memory of the institution, assure accountability vis-à-vis the controlling institutions and increase the transparency with regard to the citizens.

Thor is a web based application which supports the whole cycle for registration of documents. A central Registry is responsible for the registration of documents while the normal users of the application are responsible for the follow-up of incoming documents and the preparation of internal and outgoing documents.

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

The access to information is divided into the following:

(1) Access to a document

- (a) Staff of the Document Management Centre (DMC) and the Document Management Officer (DMO) has access to all documents in Thor.
- (b) Stakeholders mentioned on a document have access to the document. With stakeholders we understand sender, recipient and workflow participants (attributions, e-Signataire).
- (c) Staff having access to the CMS case file have access to the document.

(2) Access to the entity database containing persons and organisations is only granted to DMC staff.

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?

Your data is kept in accordance with the Common Retention List of the Commission (SEC(2007)734). Depending on the type of investigation, the data is kept 5 years for non-case and non-case prima facie cases, 10 years after an investigation with no follow-up has been closed and 20 years for an investigation in follow-up counted from the follow-up is closed.

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.