

REGISTER OF PROCESSING ACTIVITIES



Legal documentation
European Data Protection Regulation

Version 4
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1 PURPOSE OF THE DOCUMENT

1.1 Introduction

The main purpose of this document is to create a register of processing activities in accordance with the provisions of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter GDPR).

Article 30 of the GDPR requires data controllers who collect information containing personal data to create a register of processing activities.

Register of processing activities

1. Each data controller and, where applicable, their representative shall keep a register of the processing activities carried out under their responsibility. This register shall contain all the information detailed below:

a) the name and contact details of the data controller and, where applicable, the joint data controller, the data controller's representative, and the data protection officer;

b) the purposes of the processing;

c) a description of the categories of data subjects and categories of personal data;

d) the categories of recipients to whom the personal data were or will be disclosed, including recipients in third countries or international organisations;

e) where appropriate, transfers of personal data to a third country or an international organisation, including the identification of that third country or international organisation and, in the case of transfers referred to in the second subparagraph of Article 49(1), the documentation of appropriate safeguards;

f) where possible, the deadlines foreseen for the deletion of the different categories of data; g) where possible, a general description of the technical and organisational security measures referred to in Article 32(1).

[....]

5. The obligations referred to in paragraphs 1 and 2 shall not apply to any company or organisation employing fewer than 250 persons, unless the processing carried out by that company or organisation is likely to result in a risk to the rights and freedoms of data subjects, is not occasional, or involves special categories of personal data referred to in Article 9(1) or personal data relating to criminal convictions and offences referred to in Article 10.

The following section defines the specific data that are processed and collected according to the processing activities previously analysed and detected in the organisation.

2 REGISTER OF PROCESSING ACTIVITIES

2.1 Personnel management

ADDITIONAL DATA PROTECTION INFORMATION	
Data controller and data protection officer	<p>Biosistemak Institute for Health System Research</p> <p>Torre del BEC (Bilbao Exhibition Centre) Ronda de Azkue, 1 48902 Barakaldo, SPAIN</p> <p>Telephone: (+34) 944 007 790</p> <p>Data Protection Officer: dpo-dpd@kronikgune.org</p>
Purposes of processing and storage periods	<p>Management of human resources and payroll, for the execution of the employment relationship.</p> <p>The data will be stored during the employment relationship and once completed, they will be kept for determining any liability.</p> <p>The economic data of this processing activity will be stored in accordance with the provisions of Provincial Law 2/2005, of 10 March, General Taxation of the Historical Territory of Biscay.</p>
Legal basis of the processing	<p>Processing is necessary for the execution of a contract to which the data subject is a party (employment contract).</p> <p>Processing is necessary to comply with a legal obligation applicable to the data controller: labour law (Royal Legislative Decree 2/2015, of 23 October, approving the revised text of the Workers' Statute Act, Royal Legislative Decree 8/2015, of 30 October, approving the revised text of the General Social Security Act) and Tax law (Provincial Law 2/2005, of 10 March, General Taxation of the Historical Territory of Biscay).</p>
Addressees	<p>Personal data may be transferred to the Mutual Insurance company, State Public Employment Service (SEPE), Bizkaia Regional Treasury, Courts and Tribunals, Social Security and Financial Entities.</p>

ADDITIONAL DATA PROTECTION INFORMATION

Exercise of rights

The data subjects may exercise their right of access, rectification, and erasure of their data, restriction of and objection to their processing, as well as the right to data portability by sending a written communication to the address of the entity, including a document accrediting their identity or to the email dpo-dpd@kronikgune.org. They also have the right to seek the protection of the Spanish Data Protection Agency.

2.2 Administrative management

ADDITIONAL DATA PROTECTION INFORMATION	
Data controller and data protection officer	<p>Biosistemak Institute for Health System Research</p> <p>Torre del BEC (Bilbao Exhibition Centre) Ronda de Azkue, 1 48902 Barakaldo, SPAIN.</p> <p>Telephone: (+34) 944 007 790</p> <p>Data Protection Officer: dpo-dpd@kronikgune.org</p>
Purposes of processing and storage periods	<p>Administrative, tax and economic management of the entity.</p> <p>The data will be stored during the employment relationship and once completed, they will be kept for determining any liability.</p> <p>The economic data of this processing activity will be stored in accordance with the provisions of Norma Foral 2/2005, of 10 March, General Taxation of the Historical Territory of Biscay.</p>
Legal basis of the processing	<p>Processing is necessary for the execution of a contract to which the data subject is a party (contracts with suppliers).</p> <p>The processing is necessary in order to comply with a legal obligation applicable to the data controller: (Provincial Law 2/2005, of 10 de March, General Taxation of the Historical Territory of Biscay, Provincial Law 7/1994, of 9 November, on Value Added Tax)</p> <p>Processing is necessary for the satisfaction of legitimate interests pursued by the data controller: keeping a record of regular suppliers and creditors and their contact persons.</p>
Addressees	<p>Personal data may be transferred to Hacienda Foral de Bizkaia, Courts and Tribunals and Financial Entities.</p>
Exercise of rights	<p>The data subjects may exercise their right of access, rectification, and erasure of their data, restriction of and objection to their processing, as well as the right to data</p>

ADDITIONAL DATA PROTECTION INFORMATION

portability by sending a written communication to the address of the entity, including a document accrediting their identity or to the email dpo-dpd@kronikgune.org. They also have the right to seek the protection of the Spanish Data Protection Agency.

2.3 Selection processes

ADDITIONAL DATA PROTECTION INFORMATION	
Data controller and data protection officer	<p>Biosistemak Institute for Health Service Research</p> <p>Torre del BEC (Bilbao Exhibition Centre) Ronda de Azkue, 1 48902 Barakaldo, SPAIN</p> <p>Telephone: (+34) 944 007 790</p> <p>Data Protection Officer: dpo-dpd@kronikgune.org</p>
Purposes of processing and storage periods	<p>Management of the selection processes for candidates to work at the entity</p> <p>The data shall be kept for the duration of the selection process and thereafter for up to one year.</p>
Legal basis of the processing	The data subject consented to the processing of his/her personal data for this purpose.
Addressees	The data will not be transferred to third parties, except for the fulfilment of legal obligations.
Exercise of rights	<p>The data subjects may exercise their right of access, rectification, and erasure of their data, restriction of and objection to their processing, as well as the right to data portability by sending a written communication to the address of the entity, including a document accrediting their identity or to the email dpo-dpd@kronikgune.org. In addition, they may withdraw their consent by the means indicated above. Finally, they also have the right to seek the protection of the Spanish Data Protection Agency.</p>

2.4 Management of research groups

ADDITIONAL DATA PROTECTION INFORMATION	
Data controller and data protection officer	<p>Biosistemak Institute for Health Service Research</p> <p>Torre del BEC (Bilbao Exhibition Centre) Ronda de Azkue, 1 48902 Barakaldo, SPAIN</p> <p>Telephone: (+34) 944 007 790</p> <p>Data Protection Officer: dpo-dpd@kronikgune.org</p>
Purposes of processing and storage periods	<p>Management and administration of the Kronikgune Research Groups.</p> <p>The data will be kept until objection to their processing or withdrawal of the consent of the data subject.</p>
Legal basis of the processing	<p>The data subject consented to the processing of his/her personal data for this purpose.</p>
Addressees	<p>The data may be provided to the rest of the participants of the Groups</p>
Exercise of rights	<p>The data subjects may exercise their right of access, rectification, and erasure of their data, restriction of and objection to their processing, as well as the right to data portability by sending a written communication to the address of the entity, including a document accrediting their identity or to the email dpo-dpd@kronikgune.org. In addition, they may withdraw their consent by the means indicated above. Finally, they also have the right to seek the protection of the Spanish Data Protection Agency.</p>

2.5 Collaborators

CATEGORY	IDENTIFICATION
Name and contact details of the data controller and, where applicable, the joint data controller, the data controller's representative, and the data protection officer	<p>HEALTH SYSTEMS RESEARCH INSTITUTE ASSOCIATION - BIOSISTEMAK</p> <p>TAX ID CODE (CIF): G95646014</p> <p>Torre del BEC (Bilbao Exhibition Centre) Ronda de Azkue, 1 48902 Barakaldo</p> <p>Telephone: 944007790</p> <p>Data Protection Officer Contact: dpo-dpd@kronikgune.org</p>
Purposes and legitimacy of the processing	Management and administration of the people who collaborate with the Association. The legitimacy of the processing lies in the fact that the data subject has given their consent to the processing of their personal data for this purpose.
Description of data subject categories	<ul style="list-style-type: none"> People who engage with the Association
Categories of personal data	<ul style="list-style-type: none"> Identifying information: Name and surname, e-mail, National ID/Tax ID Number/Foreigner's Identification Number, telephone, signature Academic and professional: Education, qualifications Job Details: Workplace and Work History
The categories of recipients to whom the personal data were or will be disclosed, including recipients in third countries or international organisations	<ul style="list-style-type: none"> Other participants in the research groups
Where possible, the deadlines foreseen for the deletion of different categories of data	The data will be kept until the data subject objects or withdraws their consent.

CATEGORY	IDENTIFICATION
Where possible, a general description of technical and organisational security measures	Security policies regarding the processing of personal data

2.6 Internal information system

CATEGORY	IDENTIFICATION
Name and contact details of the data controller and, where applicable, the joint data controller, the data controller's representative, and the data protection officer	<p>HEALTH SYSTEMS RESEARCH INSTITUTE ASSOCIATION - BIOSISTEMAK</p> <p>TAX ID CODE (CIF): G95646014</p> <p>Torre del BEC (Bilbao Exhibition Centre) Ronda de Azkue, 1 48902 Barakaldo</p> <p>Telephone: 944007790</p> <p>Data Protection Officer Contact: dpo-dpd@kronikgune.org</p>
Purposes and legitimacy of the processing	<p>Management of the information received in accordance with the criteria of Law 2/2023 of 20 February on the protection of persons who report regulatory infringements and the fight against corruption.</p> <p>The processing is legitimised by Article 6(1)(e) of the GDPR, in accordance with Article 30(2) of Law 2/2023.</p>
Description of data subject categories	<ul style="list-style-type: none"> Reporting persons Reported persons Head of Internal Information System Collaborators of the data controller
Categories of personal data	<ul style="list-style-type: none"> Identifying information: Name and surname, e-mail, National ID/Tax ID Number/Foreigner's Identification Number, telephone, signature Data relating to the facts reported
The categories of recipients to whom the personal data were or will be disclosed, including recipients in third countries or international organisations	<ul style="list-style-type: none"> Security Forces Competent administrative bodies Public Prosecutor's Office, Courts and Tribunals

CATEGORY	IDENTIFICATION
Where possible, the deadlines foreseen for the deletion of different categories of data	only for the time necessary to decide whether to open an investigation into the reported facts, as provided for in Article 32 of Law 2/2023.
Where possible, a general description of technical and organisational security measures	Security policies regarding the processing of personal data

2.7 Institutional Promotion

CATEGORY	IDENTIFICATION
Name and contact details of the data controller and, where applicable, the joint data controller, the data controller's representative, and the data protection officer	<p>HEALTH SYSTEMS RESEARCH INSTITUTE ASSOCIATION - BIOSISTEMAK</p> <p>TAX ID CODE (CIF): G95646014</p> <p>Torre del BEC (Bilbao Exhibition Centre) Ronda de Azkue, 1 48902 Barakaldo</p> <p>Telephone: 944007790. Data Protection Officer Contact: dpo-dpd@kronikgune.org</p>
Purposes and legitimacy of the processing	Manage information to promote the activity undertaken by the Association. The legitimacy of the processing lies in the fact that the data subject has given their consent to the processing of their personal data for this purpose.
Description of data subject categories	<ul style="list-style-type: none"> Persons consenting to participate in promotional activities
Categories of personal data	<ul style="list-style-type: none"> Identifying information: Name and surname, e-mail, National ID/Tax ID Number/Foreigner's Identification Number, telephone, signature. Image/voice
The categories of recipients to whom the personal data were or will be disclosed, including recipients in third countries or international organisations	<ul style="list-style-type: none"> Advertising, dissemination and promotional activities. Social media.
Where possible, the deadlines foreseen for the deletion of different categories of data	The data will be kept until the data subject objects or withdraws their consent.
Where possible, a general description of technical and organisational security measures	Security policies regarding the processing of personal data