



European Committee
of the Regions

Record of processing activity – Working document

Stress Screening

PART 1 - Record

1. General Information

Reference number	RE3-21
Last update	17/08/2023
Controller	European Committee of the Regions
Directorate	Directorate E
Unit	E.3 Working conditions and talent management
Contact details	ServiceMedicalCdR@cor.europa.eu
Joint controller	N/A
Joint controllership arrangement	Available internally
DPO contact details	data.protection@cor.europa.eu
Processor(s)	<p>Firstbeat Technologies Ltd is producing automated individual report by automated computer program to the participant and the Medical Service.</p> <p>Firstbeat Technologies Oy (business ID 1782772-5), address Yliopistonkatu 28 A, 40100 Jyväskylä, Finland and the data controller can be contacted by email at support@firstbeat.com or by phone tel. +358 20 7631 660.</p>
Data processing agreement	Available internally

2. Purpose and description of the personal data processing

Purpose(s) of the personal data processing	<p>Belgian legislation, in particular Articles 3 and 8 of the Royal Decree of 10 April 2014 regarding the prevention of psychosocial risks at work, obliges the employer to analyse and chart possible psychosocial risks at work.</p> <p>Firstbeat Life is a subscription-based corporate wellness solution designed to support employee health risk management and workplace health promotion. The Committee of the Regions' Medical service is focusing on stress and burnout prevention and, for that reason a more detailed tool for evaluating stress among staff has been acquired.</p> <p>Firstbeat Life is a pro-grade physiological measurement tool to measure level of the stress based on heart rate variability. Based on measurements individual report and feedback is provided directly to the participant. Firstbeat Technologies Ltd is producing automated report which to the Medical Service and the Medical Officer and /or Nurse of the CoR Medical service have an access to and will provide</p>
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	<p>based on the report individual guidance for a healthier lifestyle with explanations and coaching in managing stress.</p>
<p>Categories of persons whose personal data are processed</p>	<p>CoR staff members who voluntary participate. Staff will be informed about their possibility to participate in the "Firstbeat Life" via the intranet, general emails and posters in the Medical Service's premises and their visits in the the Medical Service. Staff members who are interested in participating to the "Firstbeat Life" will themselves contact the Medical Service if they wish to perform the test.</p>
<p>Categories of personal data processed</p>	<p>The categories of the data (partial or complete) are: first name, family name, email address, date of birth, gender, height, weight, activity class, max heart rate, resting heart rate, maximal oxygen consumption (VO2max), information about chronic diseases and medication, heart rate variability measurements and diary entries during measurement period, e.g. alcohol consumption, short time diseases and medication, entries of particular events voluntary written by the data subjects. All diary entries are voluntary written by the data subject through the application on their smartphone.</p> <p>The COR Medical Service collects the names of data subjects who participate in order to verify that each participant has returned the heart rate variability measurement device to the Medical service after the measurement period.</p>
<p>Recipients of the personal data</p>	<p>Individual measurement values are analysed at Firstbeat by automated computer program for the purpose of carrying out basic operations and support operations.</p> <p>Firstbeat is based in Finland and subject to national law (The Finnish Data protection Act) which implements the EU General Data Protection Regulation (GDPR).</p>
<p>Transfers of personal data to a third country or an international organization</p>	<p>No</p>
<p>Retention period of the personal data</p>	<p>No information will be kept by the Medical Service. The report is automatically generated to the data subject concerned.</p> <p>The assessment report and the measurement data will be available to the data subject online on the server of Firstbeat Ltd until end of the measurement period. Only anonymous, non-identifying data may be used by Firstbeat for statistical purposes. After measurement period the raw measurement data is kept crypted 24 months on the server of Firstbeat Ltd and it is not visible to the data subject neither to the Medical Service.</p> <p>If the data subject requests in writing, the report can be stored in the data subject's medical file during a one year retention period. After the retention period the report is automatically destroyed by the Medical Service.</p>

<p>General description of security measures, where possible</p>	<p>Regarding paper files No paper file will be kept by the Medical Service. The report will be directly created to the data subject's smartphone through application that is protected by private password. If the data subject is requesting for a paper report or safekeeping of the report in their medical file, consent is signed separately.</p> <p>Regarding electronic files The assessment report will be available to the data subject online through the application on the server of Firstbeat Ltd until end of the measurement period after which date period the raw measurement data is kept crypted 24 months on the server of Firstbeat Ltd and it is not visible to the data subject neither to the Medical Service. Only anonymous, non-identifying data may be used by Firstbeat for statistical purposes.</p>
<p>Data protection notice</p>	<p>Published internally</p>