



RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

according to Article 31 of [Regulation \(EU\) 2018/1725](#)

Title
Family allowances, comprising household (family status), dependent children & education allowance

1) Controller(s) ¹ of data processing activity (Article 31.1(a))
<p>EFSA unit in charge of the processing activity: Human Capital Unit (HuCap)</p> <p>EFSA Data Protection Officer (DPO): DataProtectionOfficer@efsa.europa.eu</p> <p>Is EFSA a co-controller? No</p> <p>If yes, indicate who is EFSA's co-controller:</p>

2) Who is actually conducting the processing? (Article 31.1(a))
<p>The data is processed by EFSA itself X</p> <p><i>Indicate the EFSA units or teams involved in the data processing:</i></p> <p>HR partners at HUCAP Unit supporting EFSA staff in all Units</p> <p>The processing operation is conducted together with an external party <input type="checkbox"/></p> <p><i>Please provide below details on the external involvement:</i></p>

3) Purpose of the processing (Article 31.1(b))
<p>Family allowances are granted to Officials, Temporary staff and Contract staff in accordance with the Staff Regulations and consist of a household allowance, an allowance for each dependent child and an education allowance for dependent child(ren).</p>

4) Legal basis and lawfulness of the processing (Article 5(a)-(d)):
<i>Processing necessary for:</i>
<p>(a) a task carried out in the public interest or in the exercise of official authority vested in EFSA X</p> <p>(b) compliance with a legal obligation to which EFSA is subject X</p>

¹ The controller decides on the purposes and means of the data processing. In case of joint controllership (e.g. systems of the European Commission applied by EFSA or jointly with another agency), EFSA is a co-controller.

- (c) performance of a contract with the data subject or to prepare such contract
- (d) The data subject has given consent (ex ante, explicit, informed)

Further details on the legal basis:

- Article 67 of the Staff Regulations
- Annex VII of the Staff Regulations, i.e. Article 1 thereof (household allowance), Article 2 (dependent child allowance), Article 3 (education allowance)
- Article 20, 21 and 92 of the CEOS ;
- Commission Decision C(2013)8971

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

Whose personal data are processed?

- | | |
|---|-------------------------------------|
| EFSA statutory staff | <input checked="" type="checkbox"/> |
| Other individuals working for EFSA (consultants, trainees, interims, experts) | <input type="checkbox"/> |
| Stakeholders of EFSA, including Member State representatives | <input type="checkbox"/> |
| Contractors of EFSA providing goods and services | <input type="checkbox"/> |
| The general public, including visitors, correspondents, enquirers | <input type="checkbox"/> |
| Relatives of the data subject | <input type="checkbox"/> |
| Other categories of data subjects (please detail below) | <input type="checkbox"/> |

Further details concerning the data subjects whose data are processed:

Officials, Temporary staff and Contract staff at EFSA

6) Type of personal data processed (Article 31.1(c))

a) General personal data

The personal data concerns:

- | | |
|---|-------------------------------------|
| Name, contact details and affiliation | <input checked="" type="checkbox"/> |
| Details on education, expertise, profession of the person | <input type="checkbox"/> |
| Curriculum vitae | <input type="checkbox"/> |
| Financial details | <input type="checkbox"/> |
| Family, lifestyle and social circumstances | <input checked="" type="checkbox"/> |
| Goods and services the person provides | <input type="checkbox"/> |

Other personal data (please detail):

b) Sensitive personal data (Article 10)
 The personal data reveals:

Racial or ethnic origin of the person

Political opinions or trade union membership

Religious or philosophical beliefs

Health data or genetic or biometric data

Information regarding the person's sex life or sexual orientation

Further details concerning the personal data processed:

Use of editable PDF forms to be completed electronically and with electronic signature. The data subject has to submit the completed forms by e-mail to the relevant HR Partners together with scanned copies of supporting documents.

Especially as concerns the education allowance: information contained on the education allowance electronic form, containing:

- Education status declaration for each dependent child
- Part A – details on transport and registration fees
- Part B – attendance certificate
- Part C - declaration on accommodation costs
- Scanned copies (PDF format) of relevant supporting documents, including proof of payment for transport and accommodation costs

7) Recipients of the data (Article 31.1(d))

Line managers of the data subject

Designated EFSA staff members

Other recipients (*please specify*):

- HR partners at HUCAP Unit
- Services of the European Commission involved, i.e. Paymaster Office (PMO)
- EFSA Internal Auditor
- Institutions or bodies having a legitimate purpose of audit, of the exercise of supervisory tasks or in charge of judicial proceedings: the Internal Audit Service, the EU Court of Auditors, the EU Ombudsman, OLAF, the EU Court of Justice, the European Data Protection Supervisor.

8) Transfers to recipients outside the EEA (Article 31.1 (e))

Data are transferred to third country recipients:

Yes No

If yes, specify to which third country:

If yes, specify under which safeguards:

Adequacy Decision of the European Commission

Standard Contractual Clauses

Binding Corporate Rules

Memorandum of Understanding between public authorities

9) Technical and organisational security measures (Article 31.1(g))

How is the data stored?

On EFSA's Document Management System (DMS)

On a shared EFSA network drive or in an Outlook folder

In a paper file

Using a cloud computing solution (please detail the service provider and main characteristics of the cloud solution, e.g. public, private)

On servers of an external service provider

On servers of the European Commission or of another EU Institution

In another way (*please specify*):

Please provide some general information on the security measures applied:

Paper-based data storage: documents are collected in the paper folder with HUCAP Unit. (in the future likely to be substituted by electronic storage depending on deployment new HR management system SYSPER)

Paper files are kept in lockers closed by key with access to HR Partners in charge.

10) Retention period (Article 4.1 (e))

- Education allowance forms and PDF copies of relevant supporting documents are kept with HUCAP Unit as financial supporting documents for a period of 5 years after the budgetary discharge of two in accordance with the Financial Regulation (5+2= 7 years)
- EFSA staff is asked to keep the original supporting documents for 18 months
- The household allowance forms (family status) are placed in the personal file for the entire

career of the staff member + 9 months

11) Consultation with the Information Security Officer

Was the ISO consulted on the processing operation ?

Yes No

If yes, please provide some details on the consultation with the ISO:

12) Information given to data subjects (Articles 15 and 16)

Has information been provided to data subjects on the way their data is processed including how they can exercise their rights (access, rectification, objection, data portability)? Usually this information is provided in a Privacy Statement, specifying the controller's contact details. As possible, please provide a link to the relevant Privacy Statement or a description.

- The Education Allowance electronic form contains a brief note concerning data protection. To exercise the right of access or to ask for the correction of incorrect data in his file, the data subject should contact the HR Partner in charge.
- The Family Status form contains a data protection notice.

- Data subjects can exercise their rights at any time by contacting the HUCAP Head of Unit. Justified requests for blocking and erasure will be handled within 5 working days.

Last update of this record: 24/03/2020

Reference: DPO/HR/6