



RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

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

Title
Time management - management of leaves, absences, flexitime and teleworking

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 <input checked="" type="checkbox"/></p> <p><i>Indicate the EFSA units or teams involved in the data processing:</i></p> <p>The Human Capital Unit (HUCAP) of EFSA is the controller of the processing operation. The Unit can be contacted regarding SYSPER writing to: HUCAP_SYSPER@efsa.europa.eu The SYSPER business manager is Victor Vannoni.</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>Time management in accordance with the EU Staff Regulations, including the recording of presence, leaves and absences, flexitime, teleworking</p>

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

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 checked="" 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:

Statutory staff employed at EFSA or who have been employed at EFSA, including officials, temporary agents, contract agents, as well as other categories of workforce including Seconded National Experts, trainees and interim workers.

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:

The personal data on EFSA jobholders processed concern their identification data and basic information related to the EFSA employment and related rights and obligations, such as name, address, contact details, date & place of birth, nationality(ies), personnel number, type and duration of contract, grade & step, family composition, remuneration, job assignment, work pattern and absences.

(It should be highlighted that the data that will be processed through SYSPER in which the Time management module (TIM) is only one amongst various SYSPER modules. Depending on future extension to additional SYSPER modules, the range of personal data processed on EFSA jobholders may extend.)

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

Line managers of the data subject

Designated EFSA staff members

Other recipients (*please specify*):

Designated staff: HUCAP staff in charge of human resource management according to their specific area of competence

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 | <input type="checkbox"/> |
| Standard Contractual Clauses | <input type="checkbox"/> |
| Binding Corporate Rules | <input type="checkbox"/> |
| Memorandum of Understanding between public authorities | <input type="checkbox"/> |

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

How is the data stored?

- | | |
|--|-------------------------------------|
| On EFSA's Document Management System (DMS) | <input type="checkbox"/> |
| On a shared EFSA network drive or in an Outlook folder | <input type="checkbox"/> |
| In a paper file | <input type="checkbox"/> |
| Using a cloud computing solution (please detail the service provider and main characteristics of the cloud solution, e.g. public, private) | <input type="checkbox"/> |
| On servers of an external service provider | <input type="checkbox"/> |
| On servers of the European Commission or of another EU Institution | <input checked="" type="checkbox"/> |
| In another way (<i>please specify</i>): | <input type="checkbox"/> |

Please provide some general information on the security measures applied:

The time management of EFSA staff is managed through SYSPER as from May 2020 onwards.

SYSPER provides an electronic validation of the users managed by means of the common certification service of the European Commission (ECAS);

The system is developed and maintained by the European Commission, datasets are stored in the data center of the European Commission located in Luxembourg, covered by state-of-the-art measures of DG DIGIT to protect data integrity and confidentiality. A Security Convention is in place with DG DIGIT on the basis of which EFSA enjoys DG DIGIT's system security settings and monitoring.

System access rights are distributed to specific user groups according to the principle of 'the need to know' taking into consideration the function, the job and responsibilities of users.

Access rights including delegations thereof are continuously monitored and kept up to date.

Managers shall periodically check the validity of user delegations;

Audit trails of data access and manipulation in SYSPER are maintained for information security purposes.

10) Retention period (Article 4.1 (e))

In general, personal data is stored in SYSPER for the entire career duration of the staff member at EFSA + an additional period of 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:

For details see above point 9

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.

A privacy statement is linked on all EFSA Intranet Pages developed for the use of SYSPER, including the one on time management.

Each jobholder can anytime access their own data and career information processed throughout the SYSPER modules (ORG,PER,CAR,TIM).

Certain data can be inserted and edited by the jobholder him/herself whereas the adjustment or rectification of other data requires the prior validation by HUCAP, i.e. data affecting financial rights and duties. To that end, the jobholder can at any time contact HUCAP with requests concerning their personal data in the specific SYSPER modules:

HUCAP_SYSPER@efsa.europa.eu

Last update of this record:26/05/2020

Reference: DPO/HR/3