



European Research Council
Executive Agency

Established by the European Commission

RECORD OF PERSONAL DATA PROCESSING

Art. 31 of the REGULATION (EU) 2018/1725 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC ("Data Protection Regulation")

Record n°

DPO 36-2020

In accordance with Article 31 of the data protection regulation, individuals whose personal data are processed by the Executive Agency in any context whatsoever are to be protected with regard to the processing of personal data and the Executive Agency has to keep records of their processing operations.

This record covers two aspects:

- 1. Mandatory records under Art 31 of the data protection regulation (recommendation: make the header and part 1 publicly available)*
- 2. Compliance check and risk screening (initial; part 2 is internal only to the Agency, not published)*

The ground for the record is (tick the relevant one):

- Regularization of a data processing operation already carried out*
- Record of a new data processing operation prior to its implementation*
- Change of a data processing operation.*
- Migration from notification to record.*

HR Reports extracted from Business Objects

1	Last update of this record if applicable	HR Reports extracted from Business Objects (DPO 57-2013): Ares(2013)708987 - 17/04/2013
2	Short description of the processing	<p>In order to ensure the management and organisational needs of the European Research Council Executive Agency (ERCEA), the HR Unit generates and dispatches reports through the application SAP Business Objects (BO).</p> <p>The HR Unit reports on staff composition, time management and training. The BO reporting platform obtains the data through COMREF from SYSPER and EU Learn.</p> <p>Four "standard" reports are regularly produced and automatically dispatched: Staff Global, Staff Details, Management and work patterns reports. Next to these, ad hoc reports can be produced for specific data needs.</p>

Part 1 - Article 31 Record

3	Function and contact details of the controller	Head of the Human Resources Unit (ERCEA.D.2) ERC-HR-REPORTS@ec.europa.eu
4	Contact details of the Data Protection Officer (DPO)	ERC-DATA-PROTECTION@ec.europa.eu
5	Name and contact details of joint controller (where applicable)	N/A
6	Name and contact details of processor (where applicable)	N/A
7	Purpose of the processing	<p>In the context of HR management, HR reports enable the Agency's management and the HR Unit to keep an overview of the historical development of the ERCEA's staff. HR reports are also an internal control mechanism of the HR function.</p> <p>In the context of the ERCEA management, HR reports are used for capacity planning purposes, to enable benchmarking with the Commission services and those of other Executive Agencies as well as to help meet the needs and comply with the objectives of the service by providing an overview of existing human resources.</p>
8	Description of the categories of data subjects	<p>Whose personal data are being processed?</p> <p>Business Objects contains data of the following data subjects, which are processed to create HR reports containing staff or statistical data:</p> <p><input checked="" type="checkbox"/> EA staff [Former and current Contract and Temporary Agents].</p> <p><input type="checkbox"/> Visitors to the EA</p> <p><input checked="" type="checkbox"/> Contractors providing goods or services [Former and current intra-muros experts, interim staff].</p> <p><input type="checkbox"/> Applicants</p> <p><input checked="" type="checkbox"/> Relatives of the data subject [Dependent children, spouse/partner of former and current EA staff].</p> <p><input type="checkbox"/> Complainants, correspondents and enquirers</p> <p><input type="checkbox"/> Witnesses</p>

		<input type="checkbox"/> Beneficiaries <input checked="" type="checkbox"/> External experts [Former and current Seconded National Experts]. <input checked="" type="checkbox"/> Other [Former and current Blue Book Trainees].
9	Description of personal data categories Indicate all the categories of personal data processed and specify which personal data are being processed for each category (between brackets under/next to each category):	<i>Categories of personal data:</i> The following data categories are available in Business Objects: <input checked="" type="checkbox"/> in the form of personal identification numbers [Unique payroll number (NUP number), personnel ID, ERCEA personnel number (SYSPER number)]. <input type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints <input checked="" type="checkbox"/> concerning the data subject's private sphere [Marital (civil) status]. <input checked="" type="checkbox"/> concerning pay, allowances and bank accounts [Work pattern leave allowances]. <input checked="" type="checkbox"/> concerning recruitment and contracts [Active/non-active employment in the ERCEA, statutory link, service of employment, Head of service and department, function group, grade and step and seniority, contract duration (start and end dates), max. and min. grade of contract, probation period end date, first contract start date in EU Institution or agency]. <input checked="" type="checkbox"/> concerning the data subject's family [First and last name, date of birth and personal situation of dependent children, first and last name of spouse/partner]. <input checked="" type="checkbox"/> concerning the data subject's career [Standard job title; Information on training courses (e.g. participation status, length of training course, future training applications); SYSPER job objective title, description, creation date, version and validity; administrative position start and end dates]. [Data concerning presences and flexitime, including presence periods, carry-over of flexitime balance and other modifications]. [Telework type (regular or occasional), status of request, period of telework, request withdrawals, comments related to request]. <input checked="" type="checkbox"/> concerning leave and absences

		<p>[Absence requests, absences IDs and descriptions and status and periods of requests as well as type of absence (e.g., with/without medical certificate, annual leave, time credit, flexitime compensation, special leave, maternity leave, leave balance, work-patterns), withdrawal of requests, date of validation of requests, overall leave rights].</p> <p><input checked="" type="checkbox"/> concerning missions and journeys</p> <p>[Mission status, period of mission, destination and purpose].</p> <p><input checked="" type="checkbox"/> concerning social security and pensions</p> <p>[Work pattern pension contribution rates].</p> <p><input type="checkbox"/> concerning expenses and medical benefits</p> <p><input checked="" type="checkbox"/> concerning telephone numbers and communications</p> <p>[Professional phone number].</p> <p><input checked="" type="checkbox"/> concerning names and addresses (including email addresses)</p> <p>[First and last name, administrative address and professional e-mail address, private postal address].</p> <p><input checked="" type="checkbox"/> Other:</p> <p>[Nationality, gender, date of birth and age].</p> <p><i>Categories of personal data processing likely to present specific risks:</i></p> <p><input type="checkbox"/> data relating to suspected offences, offences, criminal convictions or security measures</p> <p><input checked="" type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct)</p> <p>[Monthly management reports contain data above that can be used to evaluate the data subject].</p> <p><i>Categories of personal data whose processing is prohibited, with exceptions (art. 10 new Regulation):</i></p> <p><input type="checkbox"/> revealing racial or ethnic origin</p> <p><input type="checkbox"/> revealing political opinions</p> <p><input type="checkbox"/> revealing religious or philosophical beliefs</p> <p><input type="checkbox"/> revealing trade-union membership</p> <p><input checked="" type="checkbox"/> concerning health</p> <p>[Absence with/without medical certificate, medical part-time, work patterns, justifications of leave may also contain references to health].</p>
--	--	--

		<input type="checkbox"/> genetic data, biometric data for the purpose of uniquely identifying a natural person <input type="checkbox"/> concerning sex life or sexual orientation <i>Specify any additional data or explanatory information on the data being processed, if any:</i> SAP Business Objects refreshes the data through COMREF (and thus SYSPER and EU Learn) every morning.
10	Retention time (time limit for keeping the personal data)	SAP Business Objects processes personal data from COMREF for various reporting purposes linked to human resources management and administration. Reports containing non-anonymized personal data are stored for up to 5 years, in order to serve for the monitoring of procedures derived from the Staff Regulations (e.g. retrieving information in order to follow the administrative procedure that may lead to a declaration of invalidity of a staff member). Is any further processing for archiving purposes in the public interest, historical, statistical or scientific purposes envisaged? <input checked="" type="checkbox"/> yes <input type="checkbox"/> no. The purpose of processing HR Reports is for statistical and historical purposes. Reports containing non-anonymized personal data are stored for 5 years.
11	Recipients of the data	The persons with access to your personal data, on a need-to-know basis, are: - The members of the HR Unit and authorised personnel dealing with HR reports in Business Objects; - The Director of the ERCEA and the Heads of Department, Heads of Unit, Heads of Sector (only C.O, D.O, CAO). In addition, certain administrative details may be disclosed, in compliance with the relevant current legislation and established case law, and on a temporary basis to legislative or supervisory bodies of the ERCEA, as well as auditing bodies or courts.
12	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	N/A
13	<u>General</u> description of the technical and organisational security measures	The HR Unit is responsible for the management of any documents produced, circulated and/or received, ensuring the appropriate treatment of all documents. E-mails including personal data are sent only to the secured mailboxes of specific recipients. Access to files saved in the Shared Drive, the HR Intranet collaborative

		platform, the FMB (ERC-HR-REPORTS@ec.europa.eu), of which a physical copy is kept, is limited to authorised personnel. Access to Business Objects is restricted by password to specific users only.
14	Information to data subjects/Specific Privacy Statement (SPS)	The Data Protection Notice is published on the ERCEA intranet " <i>Human Resources - Data Protection & Privacy</i> ": http://intranet.ercea.cec.eu.int/services/human-resources/priv/Pages/default.aspx