



NOTIFICATION

FOR DATA PROCESSING OPERATIONS

Date of registration: 28.6.2011

Register No: HR9

1. Name of the data processing operation

Time registration and flexitime

2. Data Controller

Programme or Group:	ADS 1/Human Resources Management
Function:	Head of Group
Contact person:	Catia Marigo, catia.marigo@eea.europa.eu

3. Description of the processing operation

3.1. Area of activity in which the processing is carried out

The time registration system is used to collect information on the time consumption for all activities listed in the Annual Management Plan. The time registration system includes a flexi time balance which is measuring worked hours compared to normal working hours (i.e. 37,5 hours for a full time employee). Hours in excess of normal working hours can be recuperated in accordance with the EEA flexi time policy. As part of the follow up on work-life balance statistical data is provided to management to ensure that staffs well-being and work load is monitored.

Flexitime is based on the principle of time-keeping of worked hours supported by a transparent verification system which should be easy and fast to use.

The personal data processed within the flexitime do not fall under Article 27 of Regulation (EC) No 45/2001; no confidential data is stored.

3.2. Modalities for the processing operation

☐ Manual processing	
☒ Automated processing	The entry for the time registration is done by each staff member in an application available on the EEA intranet. Detailed information is provided in the flexi-time policy and the explanatory note on time registration system published on the EEA intranet and available for download.

3.3. Are the Personal data processed by an entity external to EEA ('processor')

- | | |
|-------------------------------------|-----|
| ☐ | Yes |
| ☒ | No |

4. Lawfulness and purpose of the processing

4.1. Legal basis

- o Staff regulation of Officials and Conditions of employment of other servants of the European Communities, and in particular Article 55 thereof
- o Communication of the Commission on the use of flexi-time in the Commission services SEC(2006)956 of 19.7.2006
- o Administrative notice No 62/2006 of 21.12.2006: Guide to flexi-time SEC(2006)1796
- o Time registration system – internal user guide
- o EEA Flexi-time policy (version dated 2008)

4.2. Grounds for lawfulness

Processing is necessary for the performance of a task carried out in the public interest by the Community institutions and bodies which includes the processing of personal data necessary for the management and functioning of those institutions and bodies (Article 5(a) of Regulation (EC) No 45/2001).

4.3. Purpose of the processing

Data extracted from the time registration system is used for multiple purposes. Primarily for statistical and planning purposes in the Activity Based Budgeting processes used in the EEA. Project managers monitors as well the work support from project contributors (via the EEA Management Plan System) in order to be able to identify bottle necks or available human resources (i.e. time budget versus time registered). This is achieved by allowing staff member to report daily on the time spent on each project relevant for his/her function.

Time sheets extracted from the time registration system is used as supporting documentation for the financial files for consultants working intra-muros.

Flexitime allows EEA staff members to record on a daily/weekly basis their working hours and to decide on their arrival and departure times while respecting specific core hours (9h30-12h00; 14h00-15h30); it allows then the evaluation of the weekly working hours and the subsequent calculation of credits and debits.

5. Features of the processing operation

5.1. Categories of data subjects concerned

All EEA statutory staff members, seconded national experts, consultants and interim staff members

5.2. Categories of data

Name of the staff member, personal number, number of days off & holidays, sickness, missions, training, etc... On the basis of those data the system calculates, for each staff member, the balance between official working hours and real working hours (credit/debit).

6. Retention practice of personal data

Time records will be retained for 10 years, which is the retention period for financial files. If an individual is erased from the Personnel database the time records will be invalid and not possible to associate with a name or any other details linking to an individual.

7. Personal data processed for historical, statistical or scientific purposes

Purpose	Categories of data	Storage media
☐ Historical	Not applicable	☐ Anonymous ☐ Encrypted
☒ Statistical	Time budget and consumption	☒ Anonymous ☐ Encrypted
☐ Scientific	Not applicable	☐ Anonymous ☐ Encrypted

8. Recipients or categories of recipients to whom the data might be disclosed

The data concerning the individual working time will be disclosed to:

- the concerned member of staff (for consultation and modification);
- the hierarchy of the staff member concerned (for consultation and modification);
- access to the time recording system is determined by roles identified either in the EEA Management Plan System (time – centralised with access to all records, and a “time – decentralised role granting access only to own Department). A limited number of ADS and IT staff managing the implementation of the time registration system (for consultation, modification and reporting) have the Time-centralised role. In addition hereto all staff with Managing Officer rights in the personnel database have access to correct time registrations (a so-called flexi-balance correction) used whenever a member of staff is granted compensation for accumulated overtime

9. Proposed transfer of personal data to third countries or international organisations (Please tick whichever is applicable or indicate 'n/a' (not applicable))

- | | |
|------------------------------|---|
| ☐ Yes | ☒ No transfer of personal data to third party countries or international organisations. |
|------------------------------|---|

10. Information given to the data subjects as described in Articles 11 & 12 of the Regulation (EC) No 45/2001)

- The flexi-time policy and an explanatory note on the time registration system are published on the EEA intranet and available for download
- A privacy statement is also attached to the flexi-time policy (see annex 1 to this notification)
- Information session and presentation are also given as part of the welcome programme for any new staff

11. Procedures to enable data subjects to exercise their rights (as indicated in Articles 13 to 19 of the Regulation (EC) No 45/2001, i.e. access, rectification, blocking, erasure, objection)

Each staff member has a read/write access to his/her own data during the week he/she is actually working and he/she encodes the working hours as well as supplementary information (leave, sick leave, flexi-time). Moreover, each staff member has a read access to all his/her individual data that are past (right of access) and where necessary to rectify previously made registrations upon justified request to his/her line manager (right of rectification).

12. Time limits for blocking and erasure of the different categories of personal data (on justified legitimate request from the data subject – Please, specify the time limits for every category)

Categories of data	Blocking	Erasure
Data related to the registration of time against projects (see point (6) above)	Usually immediately, but at maximum within 2 working days	Usually immediately but at maximum within 2 working days