

RECORD OF PROCESSING OPERATION¹ ON

Management of leave entitlements including annual leave, special leave and sick leave

Nr.	Item	Description
1.0	Last update of this record	7.4.2021
1.1	Reference number	DP.HR.18.3_Leave
1.2	Name and contact details of controller	Head of Group Human Resource Management Personnel@eea.europa.eu
1.3	Name and contact details of joint controller(s) (where applicable)	N/A
1.4	Name and contact details of the processor (where applicable)	N/A
1.5	Name and contact details of the DPO	DPO@eea.europa.eu
1.6	Purpose of the processing	Personal data is collected and further processed for the purpose of the management and administration of data related to leave entitlements including annual leaves, special leaves and sick leaves, in compliance with the Staff Regulations and its implementing provisions.
1.7	Description of categories of persons whose data the EEA processes and list of data categories	EEA staff members currently employed, including officials, temporary agents, contract agents and seconded national experts. The personal data collected and processed can relate to all or some of the following data: - Basic administrative data such as personnel number, name, job title, organisational placement, gender, date and place of birth, and date of entry into service - In case of special leave, the data may also include a doctor's certificate, birth or death certificate, marriage certificate, etc... related to

¹ Record of EEA activities processing personal data, based on Article 31 of 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.

		<p>the data subject concerned and/or his/her relatives</p> <ul style="list-style-type: none"> - In case of sick leave, the data may include a medical certificate or aptitude certificate
1.8	Time limit for keeping the data	<p>Personal data related to annual leave and special leave shall be kept for a maximum period of three years as from the leave occurrence.</p> <p>The health data related to absence due to sickness are kept by HRM Group for a maximum period of three years after the last medical document related to a specific sick leave is inserted in the file, in the light of Article 4 (1) (e) of Regulation (EU) 2018/1725. Health data related to absence due to sickness may be retained until the end of a possible dispute or appeal if one started or was lodged before the end of the period above-mentioned.</p> <p>Aptitude certificates stating the aptness or not are kept in the personal file of the staff member concerned. The latter is kept for ten years after the end of the employment or the last pension payment.</p> <p>Anonymous data related to leave and absence is kept for statistical purposes (leaves, special leaves and absences).</p>
1.9	Recipients of the data	<p>The leave data are disclosed to:</p> <ul style="list-style-type: none"> - the hierarchy of the staff member concerned (for consultation and approval) - the HRM group (for definition of leave entitlements, verification of special leave requests, and reporting) - the accountant and or deputy accountant managing the payment of related allowances (e.g. annual travel) <p>In case of leave, data subjects may also disclose the information to external contacts by setting their out-of-office auto reply in their email account.</p> <p>Leave entries are displayed on the intranet as a general leave encoding with information about approved or expected duration.</p>
1.10	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<p>There are no transfer of personal data to third countries or international organisations.</p>

1.11	General description of security measures (where possible)	<p>Only HRM group has access to documents related to sick leave and special leave. These will become part of an electronic file. Any staff member of the HRM group responsible for the management of health/medical data signs a declaration of confidentiality acknowledging that he/she is subject to an obligation of professional secrecy equivalent to that of a health professional in compliance with Article 10(3) of Regulation (EU) No 2018/1725.</p> <p>All leave requests are stored in the SIC leave database which requires a login and password.</p> <p>Medical certificates, birth and/or death certificates, marriage certificates given to the HRM group are stored in a special section of the HRM leaves files in a locked cupboard in a locked office.</p>
1.12	Measures for providing additional information, including how data subjects may exercise their rights of access, rectification, data portability (where applicable), etc.	<p>As part of the newcomers programme, each new staff member is provided with general information on leave and absence and he/she may acquaint him/herself with the SIC Leave application through the information available on the EEA intranet (see HR Portal, leave and absences section).</p> <p>Information session and presentations on leave and absences are provided to all EEA staff members on a regular basis.</p> <p>Additional information is also displayed in the Specific privacy statement available on the EEA intranet</p>