

Cedefop record of processing activity

Record of Cedefop 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 1247/2002/EC.

Nr.	Item	Description
Execution of the salary payments based on staff entitlements		
1.	Last update of this record	30/11/2022
2.	Reference number	CDFNOT016 – Execution of the salary payments based on staff entitlements
3.	Name and contact details of controller	<p><u>Cedefop – European Centre for the Development of Vocational Training</u> Postal address: Cedefop Service Post, Europe 123, 570 01 Thessaloniki, GREECE Telephone: (+30) 2310-490111 Email: info@cedefop.europa.eu</p> <p>Responsible department or role: DRS / Human Resources HR Functional email address for enquiries on processing of personal data: hr_data_protection@cedefop.europa.eu</p>
4.	Name and contact details of DPO	data-protection-officer@cedefop.europa.eu
5.	Name and contact details of joint controller (where applicable)	n/a
6.	Name and contact details of processor (where applicable)	<ul style="list-style-type: none"> Cedefop HR is responsible for managing changes to the salary, entitlements of Cedefop staff and communicating /coordinating with EC Paymaster Office (PMO), Cedefop Finance and Accounting; Cedefop Finance is responsible for preparing the salary payments and Accountancy for the actual payments;

		<ul style="list-style-type: none"> • EC Paymaster Office (PMO) calculates salaries of Cedefop staff based on information sent from Cedefop HR on a monthly basis and produces monthly salary payslips for each staff member.
7.	Very short description and purpose of the processing	<p>The purpose of the processing is to ensure the correct and timely payment of staff salaries, based on their grade and entitlements.</p> <ul style="list-style-type: none"> • HR assistant prepares an excel file with the salary changes (e.g. step change, information on new staff member, information on allowances -education, household, dependents, telephone costs, cafeteria costs, part-time, parental/family leave, etc.) and sends it to the EC Paymaster Office (PMO) by the 12th of each month; • PMO encodes the changes in their software system (NAP) and calculates the salaries for each staff member; • Before the closure of the payroll, HR assistant checks and verifies in the PMO's system that changes were executed and communicates to PMO any necessary corrections; • At the end of each month, PMO sends an email to inform HR that the payroll is ready; • HR assistant downloads a file with all Cedefop payslips and various reports for the payment of the salaries from the PMO's system; • HR assistant saves all the information in the Records Bank where only HR Finance and Accounting have access; • If the changes have not been taken into account, the information is re-sent in the next month's salary changes; • HR assistant informs/discusses with staff members concerned the changes/corrections in the salaries, where applicable; • The budget assistant prepares the regularisation of salaries based on reports received from the PMO; • HR assistants initiate and validate the workflow in Flow Forma; • Finance processes payments so salaries are paid into staff members' bank account/s;

		<ul style="list-style-type: none"> • HR assistant prepares individual payslips and runs script to email each payslip to the corresponding staff member. <p>Following Alpha bank's 2021 charges to incoming remittances to staff's accounts Cedefop's Directorate reached an exceptional agreement with the bank so that all transfers into accounts of type 'Alpha μισθοδοσία' (salary accounts) would bear no charges. For this specific purpose Cedefop's Finance and accounting and/or HR obtained consent from each staff member to share with the bank their name and IBAN/s for the bank to configure their accounts without these charges. An updated file with staff joining and staff leaving Cedefop should be send to the bank every quarter of the year. Similar agreements could be reached with other banks in the future, this is why Alpha Bank (and/or other relevant banks) has been added as a recipient for this particular list of staff names and IBAN numbers.</p> <p>Legal basis:</p> <ul style="list-style-type: none"> • Title V, Chapter 1 of the Staff Regulations, Annex VII and Annex XI of the Staff Regulations • Title II-chapter 5, Title IV-chapter 7 of the CEOS • Service level agreement signed with PMO <p>The lawfulness of the processing is defined by Article 5 (a) of Regulation 2018/1725 in that "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body" and Article 5 (d) in that applicants give consent to the processing of their personal data.</p> <p>All personal information regarding Cedefop staff salaries (e.g. entitlements, payments etc.) to be treated and marked as sensitive, non-classified (SNC) data¹.</p>
8.	Description of categories of persons whose data Cedefop processes and list of data categories	<p>Data subjects: The data subjects are officials, temporary agents and contract agents employed by Cedefop.</p>

¹ RB(2019)01250 DIR decision - Rules on sensitive non-classified information

		<p>Categories of personal data processed: The data may contain any of the following information:</p> <ul style="list-style-type: none"> • Surname and first name • Email address • Nationality • Date of Birth • Gender • IBAN of bank account number • Administrative status, grade and step (e.g. Temporary agent AD5/2) • Managerial allowance (where applicable) • Place of origin • Household allowance • Dependent child/Person treated as dependent child information • Education allowances per dependent child • Expatriation/foreign residence allowance • Marriage/divorce/recognised partnership • Birth of child/adoption of a child • Installation/Resettlement allowance • Stand-by duties • Daily subsistence allowance • Payment of expenses (e.g. telephone calls, cafeteria, post etc.)
9.	Time limit for keeping the data	<p>All records are kept according to Cedefop records management classification and retention schedule</p> <ul style="list-style-type: none"> • Records related to giving instructions to the EC's Paymaster Office PMO in Brussels for the payment of staff salaries are kept for 10 years. • Salary slips and related correspondence with PMO are kept for 5 years
10.	Recipients of the data	<p>The data may be disclosed to the following recipients:</p> <ul style="list-style-type: none"> • Each staff member is a recipient of his/her own payslip; • Designated Cedefop ICT and Records Management staff has access to the Records Bank; • List of staff names and IBAN numbers will be shared with Alpha Bank (and/or other relevant banks) to configure accounts without charges (with consent);

		<ul style="list-style-type: none"> • When necessary, access to the personal data may be granted to internal authorized Cedefop staff such as Legal Service, Internal control etc.; • When necessary, access to the personal data may be granted also to external authorized staff in public authorities or audit control or investigation bodies such as: external audit contractors, Court of Auditors, Internal Audit Service of the European Commission, European Anti-Fraud Office (OLAF), European Ombudsman, the European Data Protection Supervisor, the General Court or the European Court of Justice.
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	n/a
12.	General description of security measures where possible.	<ul style="list-style-type: none"> • Hard copies are stored in a locked filing cabinet to which only authorised HR staff has access; • EC's PMO platform is protected with username and password; • Cedefop's ICT manages security measures that protect data stored in Records Bank. These are documented in Cedefop's ICT Use and Security Policy; • MS Outlook Mailboxes are currently running on Cedefop premises and managed by Cedefop ICT; • Any electronic documents stored in Cedefop's M365 Sharepoint online environment are encrypted both at rest and in transit; • Access to Records Bank is restricted (e.g. authentication, role-based permissions, etc.); • All data processing is confidential and emails sent with "private" markings • Staff payslips are encrypted; • Communication of data is restricted to those persons who "need to know" for the performance of their duties; • Sensitive, non-classified (SNC) data in MS 365 is encrypted and treated according to RB(2019)01250 DIR decision - Rules on sensitive non-classified information.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	<i>Privacy Statement available on intranet and records bank. Also privacy statement linked to from payslip email messages.</i>