

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
Leave management		
1.	Last update of this record	16/03/2020
2.	Reference number	2012-0265 – Leave Management
3.	Name and contact details of controller	<u>Cedefop – European Centre for the Development of Vocational Training</u> Postal address: Cedefop Service Post, Europe 123, 570 01 Thermi, GREECE Telephone: (+30) 2310-490111 Email: info@cedefop.europa.eu Responsible department or role: DRS / Human Resources Functional email address for enquiries on processing of personal data: hr_data_protection@cedefop.europa.eu
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)	HR staff in charge of leave management

7.	Very short description and purpose of the processing	<p>The process is the following:</p> <ul style="list-style-type: none"> • the leave entitlements are introduced in the Fibus database by the HR service; • the annual leave requests may be introduced by the staff member in the Fibus database and will be signed in the database by the staff member's hierarchical superior; • special leave requests are entered by a staff member of the HR service on the basis of (hard copy) supporting documents. The Head of HR signs agreement to the special leave on a dedicated form. • The supporting documents for special leave are filed in the HR service. • If the hierarchical superior is absent and cannot sign the leave in Fibus, the staff member prints out a hard copy and has it signed by the back-up person for his/her hierarchical superior or requests the agreement by email which is then forwarded to the HR. The HR colleague signs the annual leave request in Fibus based on that hard copy signature and the hard copy of the signed request is filed. If the approval is given by email, the email is filed electronically. • The supporting documents concerning special leave health related are kept by the Medical Officer and included in the medical file of the staff member. The HR service receives a certificate from the Medical Officer without any medical data and based on that, the special leaves are granted. <p>Purpose of this processing operation:</p> <ul style="list-style-type: none"> • The management of all entitlements for annual leave, special leave, maternity leave, parental and family leave for Officials, Temporary Agents (TA), Contract Agents (CA) and Seconded National Experts (SNE). • The management of annual leave for trainees. • Storage of anonymised data for statistical purposes may be envisaged. <p>Legal basis:</p> <p>Data is processed in accordance with the objectives of:</p> <ul style="list-style-type: none"> • Articles 57 to 60 and Annex V of the Staff Regulations; CEOS
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		<ul style="list-style-type: none"> • Cedefop Implementing Rules on Leave (Cedefop/DGE/19/2014) • Cedefop decision laying down rules on the secondment to Cedefop of national experts (DIR/2009/259) • Rules Governing in-service training at Cedefop
8.	Description of categories of persons whose data Cedefop processes and list of data categories	<p>Data subjects: Cedefop staff, including Officials, Temporary Agents (TA), Contract Agents (CA) and Seconded National Experts (SNE), as well as trainees (for annual leave).</p> <p>Categories of personal data processed:</p> <ul style="list-style-type: none"> • Name, surname of staff member • Age and grade of staff member (for determination of annual leave entitlements) <p>Special categories of data:</p> <ul style="list-style-type: none"> • Personal data related to the family of the staff member, contained in supporting documents provided in connection with special leave entitlements (e.g. marriage, birth, death, sickness, other - certificates). • Health-related data may be processed in connection with maternity leave and various types of special leave. • Data could potentially be processed from which the sexual orientation of that staff member and his/her partner could be inferred, where he/she applies for leave to care for them.
9.	Time limit for keeping the data	<ul style="list-style-type: none"> • Paper and Fibus records related to administrating regular leave and flexitime including compensation, as well as special leave are kept for 5 years after the respective year in active status and for 5 more years in the archives. • Paper records related to sickness leave are kept for 3 years. • Requests and decisions on parental leave, family leave and unpaid leave are filed in the personal file and have the respective retention period for personal files.

10.	Recipients of the data	In addition to the HR staff mentioned as processors above, the following are provided with data related to leave management: <ul style="list-style-type: none"> • Head of DRS; • Hierarchical superior for leave data (but no information on reasons for special leave); • The AIPN; • The IT administrator for the database (for technical support); • Audit bodies, such as the European Court of Auditors and the Internal Audit Service of the Commission
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	NO
12.	General description of security measures where possible.	Fibus database has restrictive permissions for access to data. The hard copy files are stored in locked cupboards in the HR offices.
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</i>