

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
Recording of working hours and flexitime administration		
1.	Last update of this record	16/03/2020
2.	Reference number	2012-0679 – Recording of working hours and flexitime administration
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 Thermi, GREECE Telephone: (+30) 2310-490111 Email: info@cedefop.europa.eu</p> <p>Responsible department or role: DRS / Human Resources</p> <p>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)	HR staff in charge of flexitime and time recording under the supervision of the Head of Human Resources.

7.	Very short description and purpose of the processing	<p>The rules on working hours at Cedefop (Cedefop/DGE/41/2019 and the note on working hours – RB(2019)00311) are as follows:</p> <p>Working hours are from 07.30 to 20.30. They are divided into core time and into flexible time. Core time consists of periods during which all staff, if not on leave or mission, must be present. Flexible time consists of periods during which staff may choose, in agreement with their immediate superior, the times at which they arrive and leave. Based on the working hours, the system calculates whether the staff member has accumulated extra time. Accounts of surplus or deficits are calculated on a monthly basis and on a pro rata basis for part-time staff (working schedules are put manually into the system by HR). The maximum surplus taken into account per day is 120 minutes. No more than 2.5 days of compensatory leave can be acquired per calendar month. The smallest unit of calculation is half a day, which requires 3 3/4 hours of accumulated compensation in a period. While it is possible to accumulate days of such compensatory leave, no more than 2 days of compensatory leave can be used per calendar month and no more than 24 days per year. No more than 2.5 days of such compensatory leave can be carried forward at any given time.</p> <p>In no accounting period (calendar month) should a deficit exceed 16 hours. A deficit occurs if the number of hours worked in a period is smaller than the hours as determined in Article 1 (40 per week). Such a deficit must be balanced in the following accounting period of one month.</p> <p>The procedure for asking compensation for extra hours worked is as follows:</p> <ul style="list-style-type: none"> • the staff member applies for compensation via the in-house database Fibus; • the staff member's leave responsible (line manager) accepts the leave request in Fibus; • the HR staff member responsible for leave and working hours checks from a technical point of view whether the staff member has accumulated the required compensation time requested and then signs the compensation request.
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8.	Description of categories of persons whose data Cedefop processes and list of data categories	<p>Data subjects:</p> <ul style="list-style-type: none"> • officials • temporary staff • contract agents • seconded national experts • trainees

		<p>Categories of personal data processed:</p> <ul style="list-style-type: none"> • access card with an ID number link to a login (meaning link to the name of the person in a second stage); • daily arrival and departure (date /hour /minute), including any temporary absences during the day; • while on mission the staff member is credited with 90 minutes of additional compensation time per mission day <p>Based on these data, the Fibus system calculates, for each person, a balance (positive or negative) compared to the required amount of hours per month. The access card is used for both entry to and exit from the building.</p> <ul style="list-style-type: none"> • Aggregate anonymised data may be stored for historical, statistical or scientific purposes are envisaged (e.g. to track, at organisational level, staff working time).
9.	Time limit for keeping the data	<ul style="list-style-type: none"> • For security purposes, data are kept in the system for 3 years (Access control data longer than the n-3 years will be anonymised/ deleted after the staff have the chance to print/record the data currently in the system).
10.	Recipients of the data	<ul style="list-style-type: none"> • staff members in the Human Resources service • hierarchical superiors, Heads of relevant Dept and the Directorate • security guards (for the arrival and departure times) • auditing bodies (IAS, Court of Auditors) • IT administrators
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.	<ul style="list-style-type: none"> • System security (physical security in Servers Room) • Username and password on FIBUS to restrict access and privileges; audit trail is kept for changes; • All radio frequency data transmission between the card and the reader is

		encrypted using a secure algorithm.
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>