

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
Requests for Teleworking		
1.	Last update of this record	31/03/2020
2.	Reference number	CDFNOT075 – Requests for Teleworking
3.	Name and contact details of controller	<p>Cedefop – European Centre for the Development of Vocational Training 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)	<ul style="list-style-type: none"> • The line manager, i.e. Head of Department, Executive Director or Deputy Director

		<ul style="list-style-type: none"> • Staff members of human resources
7.	Very short description and purpose of the processing	<p>Description of this processing operation: Staff members wishing to request the right to telework complete a request form either by hard copy or email for either structural or occasional teleworking and bring it to their line manager (Head of Department or Deputy Director) for approval. They may, at this stage, attach further documentation to the request, which will be processed together with it or separately, in case a specific procedure is already in place (e.g. parental leave). Approved requests are brought by the applicants to the HR service, who insert the details of the requests in Cedefop's ERP, Fibus, and file hard copies in dedicated folders, if applicable. If rejected, requests are brought by the line manager to the HR service, who files hard copies in dedicated folders. Staff members are informed by their line managers of the acceptance/rejection of their request and that the application is kept with the HR service.</p> <p><i>NOTE: When staff are compelled to telework in crisis situations this does not require submission of a request.</i></p> <p>Purpose of the processing: The purpose of the processing operation is to process requests to telework with regard to different criteria, such as the possibilities of teleworking, the interests of the service and the individual's motivation.</p> <p>Legal basis of the processing operation: Data is processed in accordance with the objectives of:</p> <ul style="list-style-type: none"> • Staff Regulations of Officials of the European Communities, in particular Articles 1(e)1; • the Conditions of employment of other servants of the European Communities, in particular Articles 10 and 80 CEOS; • General implementing provision: CEDEFOP/DGE/33/2017
8.	Description of categories of persons whose data Cedefop	Data subjects:

	<p>processes and list of data categories</p>	<p>Cedefop employees</p> <p>Categories of personal data processed: The data undergoing processing are as follows:</p> <ul style="list-style-type: none"> • Personal details, i.e. name and surname, teleworking address (usually home address), teleworking phone and mobile; • Employment contract information, i.e. date of expiration; • working schedule (full time/part time); • Motivation for applying and, if need be, supporting documents; • Self-declaratory statements for the purpose of evaluating the request, i.e. having teleworked before, teleworking tasks to be performed, attendance to conferences and communication with other colleagues/line manager; • Teleworking agreement details, i.e. dates and duration of the agreement and of the trial period, teleworking schedule. <p>In principle, special categories of data within the meaning of Article 10 of Regulation (EU) 2018/1725 are not processed. However, the possibility of applicants voluntarily including some sensitive information in the motivation for their application cannot be ruled out, and in particular:</p> <ul style="list-style-type: none"> • Personal data related to the family of the staff member, possibly contained in supporting documents provided in connection with special leave entitlements; • Health-related data (in connection with mobility impairment and various types of special leave).
9.	<p>Time limit for keeping the data</p>	<p>Approved applications will be retained for three years after the calendar year in which the requested teleworking concludes.</p> <p>Rejected applications will be retained for three years after the calendar year of the application. This is to help establish, if necessary, an order of priority for persons who have applied on several occasions but were not selected due to a large number of applications.</p>

		Storage of data for historical, statistical or scientific purposes is not envisaged.
10.	Recipients of the data	The data may be disclosed to the following recipients: No recipients other than processors defined above and, if necessary, auditing/supervisory bodies (IAS, Court of Auditors, OLAF, EDPS).
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 copy requests are kept in locked cupboards in office of HR service • Data stored in Fibus has restricted access
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>