



## Record of processing activity No 9 – Time and Leave Management

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| Title                                        | Time and Leave Management                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Name and contact details of controller       | ECCC, Corporate Services Unit, HR (hr [at] eccc.europa.eu)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Name and contact details of DPO              | data-protection [at] eccc.europa.eu                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Name and contact details of Joint Controller | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Name and contact details of processor        | <ul style="list-style-type: none"> <li>European Commission, Sysper2 system, Time Management module, based on an SLA between the ECCC and the Commission.</li> <li>European Commission DG HR Medical Service (HR-BXL-CONGES-SPECIAUX-MED [at] ec.europa.eu and HR-BXL-CERTIFICATS-MEDICAUX [at] ec.europa.eu, under a specific SLA between the ECCC and the Commission for conducting medical controls/checks to sick leaves, processing medical certificates and validating sick leaves and special leaves.</li> </ul>                                                                                         |
| Purpose of the processing                    | The purpose of processing is time encoding, possible flexitime recuperation, encoding and validating (special or sick) leaves, working regime encoding (teleworking) and approval management of leaves and work patterns.                                                                                                                                                                                                                                                                                                                                                                                      |
| Description of data subjects                 | The data subjects are ECCC staff members (temporary agents, contract agents, SNEs, trainees, etc)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Description of data categories               | <p><b>Time Management:</b></p> <p>Staff name and staff number identifier, daily presence split in working hours, core hours and out of hours presence, monthly timesheets, particularly regarding the balance of time, credits or debits, compared to the expected amount of hours per month.</p> <p><b>Annual leave:</b></p> <p>Staff name and staff number identifier, date(s) of absence, phone (optional), address (optional), reason (optional).</p> <p><b>Special leave:</b></p> <p>Staff name and staff number identifier, date(s) of absence, phone (optional), address (optional), reason/type of</p> |

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|                                       | <p>special leave and supporting documents (if applicable).</p> <p><i>Note: Supporting documents are requested for processing the validation of the special leave cases.</i></p> <p><b>Sick leave:</b></p> <p>Staff name, personal number, date(s) of absence, address (optional). For the absence with a medical certificate: the GECO receives a list only mentioning the name of the staff member, the length of the absence and the type of leave (sick leave, medical part time, etc). All other data mentioned on the medical certificates are exclusively processed by the Medical Service of the Commission.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Time limits (for the erasure of data) | <ul style="list-style-type: none"> <li>• Data are generally retained for five years except where a different time limit is specific below. Data related to leaves are kept for five years (more in cases of appeal) except where one of the time limits specified below is applicable.</li> <li>• Data relating to sick leave can be kept for at least three years pursuant to Article 59(4) of the Staff Regulations, but this time period is extended to five years in order to cover legal disputes. If a jobholder is transferred to another EU agency or institution suing SYSPER 2, only the data concerning sick leave in the previous five years are communicated.</li> <li>• The retention of data relating to days of annual leave is justified in particular for the carry-over of days not taken to the following year, but will be limited to two years (at the beginning of calendar year "n" the data for year "n-3" will be suppressed).</li> <li>• Data on part-time work, parental and family leave are generally kept at least until the end of active service or even beyond that period (since they relate to a subsisting entitlement and may be appealed against).</li> </ul> |
| Data recipients                       | <ul style="list-style-type: none"> <li>• ECCC authorised staff, including the Executive Director as Appointing</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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|                                         | <p>Authority, line manager of the data subject responsible for supervision and validation of working time and leave requests, Leave Managers (GECOs) and authorised HR staff members.</p> <ul style="list-style-type: none"> <li>• European Commission SYSPER 2 and Medical Services authorized staff offering technical support related to the implementation and operation of SYSPER 2 modules, hosting of SYSPER 2 and other components, analysis of technical nature in relation to providing additional modules and services, assessment of medical certificates and special leaves supporting documents provided by staff members.</li> <li>• PMO if there is an impact on the financial entitlements of the staff member.</li> <li>• Data may also become available to bodies charged with monitoring or inspection tasks in application of EU law (e.g., internal audits, European Anti-fraud Office – OLAF, European Public Prosecutor’s Office - EPPO).</li> </ul> |
| Transfers to third countries            | No transfer of data outside the EU/ EEA is foreseen.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Security measures – General description | Processing is carried out in accordance with Commission Decision (EU, Euratom) 2017/46 and applicable ECCC information security policies and access-control measures. Access is restricted according to the need-to-know principle and role-based access rights implemented in SYSPER2 and related systems.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Privacy statement                       | A privacy notice is available to all ECCC staff members in ECCC intranet.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |