

RECORD OF PERSONAL DATA PROCESSING ACTIVITY according to Article 31 of Regulation (EU) 2018/1725

▶ SYSPER

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General information

Introduction
EIOPA, as a European Authority, is committed to protect individuals with regard to the processing of their personal data in accordance with Regulation (EU) No 2018/1725 (further referred as the Regulation) ¹ .
Contact Details of Data Controller(s)
Fausto Parente, Executive Director Westhafenplatz 1, 60327 Frankfurt am Main, Germany fausto.parente@eiopa.europa.eu
Contact Details of the Data Protection Officer
Eleni Karatza Westhafenplatz 1, 60327 Frankfurt am Main, Germany dpo@eiopa.europa.eu
Contact Details of Processor
EIOPA’s Team/Unit/Department responsible for the processing: - HR Unit

¹ 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 No 1247/2002/EC.

Description and Purpose of the Processing

Description of Processing
<p>1. The processing covers the set-up for the roll-out and the implementation of Sysper. Sysper is the integrated information system for the management of human resources in the European Commission and other EU institutions, agencies and bodies including EIOPA. More precisely, Sysper is used to a serie of horizontal, generic components, in order to support all business functions in a uniform and consistent manner. This is particularly important in key areas such as:</p> <ul style="list-style-type: none"> ▪ security (Sysper allows for the definition – and the enforcement – of a coherent, transparent and easy security policy via configuration) ▪ actors (Sysper uses information in the organisational hierarchy and jobs defined therein, in order to automatically determine who needs to do what at each step of the administrative procedures) ▪ workflows and notifications (Sysper uses common workflow and notification engines to define and execute the various workflow steps and to deliver required notifications, depending on configurable conditions). <p>2. Sysper is organised in different modules. EIOPA is currently using the following modules:</p> <ul style="list-style-type: none"> - CAR (Career), - CCP Workflow, - DOC Engine (partially), - DOT (Dotation), - Flexitime, - ORG (organizational management), - PER & FAM (identity management), - Resignation, - Telework, - TIM (time management), - 65+, - HR Reporting. <p>Data is not used for any purposes other than the performance of the activities specified above.</p>
Purpose (s) of the processing

<input checked="" type="checkbox"/> Staff administration <input type="checkbox"/> Relations with external parties <input type="checkbox"/> Procurement and accounting <input checked="" type="checkbox"/> Administration of membership records <input type="checkbox"/> Auditing <input checked="" type="checkbox"/> Information administration <input type="checkbox"/> Other (please give details):
Lawfulness of Processing
<ul style="list-style-type: none"> • Legal Basis justifying the processing: <ul style="list-style-type: none"> ○ Regulation (EEC) No 31 laying down the Staff Regulations of Officials (SR) and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community (CEOS) and the Implementing Rules thereof. ○ Service Level Agreement signed with the Commission (Directorate General of Human Resources) • Processing is necessary: <ul style="list-style-type: none"> <input checked="" type="checkbox"/> for the performance of a task carried out in the public interest <input type="checkbox"/> for compliance with a legal obligation to which the Controller is subject <input type="checkbox"/> for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract <input type="checkbox"/> in order to protect the vital interests of the data subject or of another natural person <p>Or</p> <ul style="list-style-type: none"> <input type="checkbox"/> Data subject has given his/her unambiguous, free, specific and informed consent

Data Subject's Rights

Information on how to exercise data subject's rights
<p>Data subjects may exercise their data privacy rights provided in Articles 17 to 24 of the Regulation (EU) 1725/2018.</p> <p>Data subjects have the right to:</p> <ul style="list-style-type: none"> • access their personal data, receive a copy of them in a structured and machine-readable format or have them directly transmitted to another controller, as well as request their rectification or update in case they are not accurate. • request the erasure of their personal data, as well as object to or obtain the restriction of their processing. • withdraw their consent to the processing of their personal data at any time in case such processing is based solely on their consent.

For the protection of the data subjects’ privacy and security, every reasonable step shall be taken to ensure that their identity is verified before granting access, or rectification, or deletion.

Should data subjects wish to access/rectify/delete their personal data, or receive a copy of them/have it transmitted to another controller, or object to/restrict their processing, please contact human.resources@eiopa.europa.eu or DPO@eiopa.europa.eu.

Complaint:

Any complaint concerning the processing of the data subjects’ personal data can be addressed to EIOPA’s Data Protection Officer (DPO@eiopa.europa.eu). Alternatively, data subjects can also have at any time recourse to the European Data Protection Supervisor (www.edps.europa.eu).

Restrictions (Note 8):

Without prejudice to the above, rights might be restricted in accordance with EIOPA’s decision on the restriction of data subject’s rights (EIOPA-MB-19-056)

Categories of Data Subjects & Personal Data

Categories of Data Subjects
<input checked="" type="checkbox"/> EIOPA permanent staff, Temporary or Contract Agents <input checked="" type="checkbox"/> SNEs or trainees <input type="checkbox"/> Visitors to EIOPA (BOS, MB, WG, Seminars, Events, other) If selected, please specify: <input type="checkbox"/> Providers of good or services <input type="checkbox"/> Complainants, correspondents and enquirers <input checked="" type="checkbox"/> Relatives and associates of data subjects <input type="checkbox"/> Other (please specify):
Categories of personal data
<p>(a) General personal data:</p> <p>The personal data contains:</p> <input checked="" type="checkbox"/> Personal details (name, address etc) <input checked="" type="checkbox"/> Education & Training details <input checked="" type="checkbox"/> Employment details <input checked="" type="checkbox"/> Financial details <input checked="" type="checkbox"/> Family, lifestyle and social circumstances <input type="checkbox"/> Other (please give details):

(b) Special categories of personal data

The personal data reveals:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic or Biometric data
- Data concerning health, sex life or sexual orientation

Categories of Recipients & Data Transfers

Recipient(s) of the data

- Managers of data subjects
- Designated EIOPA staff members
 - If selected, please specify:
 - HR Unit
- Relatives or others associated with data subjects
- Current, past or prospective employers
- Healthcare practitioners
- Education/training establishments
- Financial organisations
- External contractor :
 - External contractors that may be working on the maintenance of the IT infrastructure linked to Sysper.
 - Designated operational services of DG HR of the European Commission and its administrative agency (PMO) have access to the specific data in order to fulfil their human resource management tasks;
- Other (please specify):
 - Designated operational services of DG HR of the European Commission and its administrative agency (PMO) have access to the specific data in order to fulfil their human resource management tasks;
 - Other persons designated via delegation by one of the users. Not all of the users have the same access rights to personal data. The profile of each user (function and responsibility) determines their need and entitlement to access specific sets of data in Sysper;

<ul style="list-style-type: none">• Upon request and if relevant for the handling of files, the data can also be transferred to the European Court of Justice, European Ombudsman, EDPS, OLAF, Internal Audit service of the European Commission, European Court of Auditors and external advisors.
Data transfer(s)
<p><input checked="" type="checkbox"/> To other recipients within the EU (e.g. NCAs): Upon request, EIOPA may transfer to Member States certain personal data necessary to comply with Article 15 of the Protocol on Privileges and Immunities. The transfer of data to the Member States is accompanied by a legal clause excluding its use for other than the predefined purposes and also prohibiting the further transfer of data.</p> <p><input type="checkbox"/> To third countries If selected, please specify:</p> <p>Whether suitable safeguards have been adopted:</p> <ul style="list-style-type: none"><input type="checkbox"/> Adequacy Decision of the European Commission²<input type="checkbox"/> Standard Contractual Clauses (SCC)<input type="checkbox"/> Binding Corporate Rules (BCR)<input type="checkbox"/> Administrative Arrangements between public Authorities (AA) <p><input type="checkbox"/> To international organisations If selected, please specify the organisation and whether suitable safeguards have been adopted:</p>
Data subjects could obtain a copy of SCC, BCR or AA here:

Automated Decision Making

Automated Decision-making, including profiling
<p>A decision is taken in the context of this processing operation solely on the basis of automated means or profiling:</p> <p><input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p> <p>In case of an automated decision-making or profiling, please explain:</p>

² Third countries for which the European Commission has issued adequacy decisions are the following: Adequacy decisions (europa.eu)

Retention Period & Security Measures

Retention period
How long will the data be retained? In general, personal data are stored in Sysper until the end of the staff member's activities within an EU institutions, Agencies and Bodies. However, certain personal data need to be conserved for a longer period as they are related to subsisting rights and obligations, i.e . pension rights. More precisely, the retention duration of the personal data found in Sysper is administered by the owner of the system, namely DG HR.
For further processing envisaged beyond the original retention period for historical, statistical or scientific purposes, please specify whether the personal data will be anonymised: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Technical & organisational security measures taken
Several technical and organisational measures have been adopted in order to ensure the optimum security of the documents and personal data collected in the context of the procedures described under section II a).