

<b>01 - Name of processing</b>	<b>Leave Management</b>
02 - Reference	16
03 - Submission Date	02-02-12
04 - Last update	09-09-21
05a - Controller	RICOTTA Salvatore
05b - Unit-Sector	Human Resources
05c - Controller's email	HoUResourcesandSupport@era.europa.eu
06 - DPO	DataProtectionOfficer@era.europa.eu 120 Rue Marc Lefrancq, 59300 Valenciennes, France Tel.+33 (0) 32 70 96 500
07 - Name and contact details of joint controller (where applicable)	
08a - Who is actually conducting the processing? (Article 31.1(a))	The data is processed by ERA (responsible unit) itself
08b - Name and contact details of processor (where applicable)	N/A

## 09 - Purpose of processing

- To manage and monitor the administration of ERA statutory staff, SNEs and trainees pertaining to annual leave entitlements and consumption, special leave, travelling time, parental leave, part-time work, leave on personal grounds, maternity leave in line with the Commission Decision C(2013) 9051 /16.12.2013 on implementing provisions on leave + MB decision n° 131 on Art. 55a of SR concerning part-time work.
- To manage and monitor the administration of ERA statutory staff & SNE's pertaining to telework in line with the MB decision n° 141 on the application of the Commission Decision of telework.
- To produce anonymous statistical data regarding leaves and telework;
- To assist the management of ERA to better organise the working conditions;
- To produce nominative reports regarding leaves by authorized persons in a managerial position or HR staff.

In order to monitor the non-conformities on the leave procedure (leaves must be registered and approved before their occurrence), the ICC receives an automatic message when a staff member is recording a leave after the actual date of the leave.

### DURING THE COVID-19 CONFINEMENT MEASURES

- via the dedicated feature called "derogation telework" (allowing identification of who is present in the building) to ensure the organisation of office allocation and occupation minimising potential contamination to the lowest possible level. The data (name and surname) of Staff members not in Teleworking/Leave/sickness shall be disclosed on the intranet on a weekly basis to allow colleagues to be aware who is present in the building and who is not for security reason and for office space allocation considering that only 50 % of the staff is authorised to be present in the building.

## 10a - Data Subjects

All statutory staff members, SNEs and trainees (hereinafter referred to as "Staff")

10b - Personal data

The categories of personal data dealt with in this exercise are the following: family name, first name, personnel n°, annual leave (entitlements and consumption), special leave, travelling time, parental leave, maternity leave, part-time work, leave on personal grounds, sick leave justified by a medical certificate, sick leave without medical certificate (leave for a child welcomed into the household to be adopted soon) and telework arrangements. Specific health data as such are not kept, nor processed by ERA. Please see a separate notification on Health Data.

11 - Time limit for keeping the data

All working time / telework related data will be deleted once a year at the end of the month of January of the following year.

Only data related to a macroscopic vision of the time management of staff (number of days of absences from work, total number of leave days taken, etc.) will be kept for statistical reasons and will be kept anonymous.

DURING THE COVID-19 CONFINEMENT MEASURES the list of staff present in the building shall be kept for one month.

12 - Recipients of the data

The AACC.

The persons authorized to approve requests for leave (mainly the heads of departments, units, team leaders);

The designated HR staff members;

Any of the supervisory instances of ERA (i.e. European Court of Auditors, Internal Audit Service, and in case of controversy, the Civil Service Tribunal, the staff Ombudsman, etc.).

13 - Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?

N/A

14 - How is data stored? What are the security measures implemented?

A. The electronic version of data (Leama) is stored on ERA's Server. A part of the operational system is installed on each PC with the purpose to enable the data subjects to process their requests for leaves and telework arrangements.

Persons authorized to grant leave (immediate superiors, heads of departments / unitsteam leaders) can access the information related to the data subjects under their authority only, in order to approve/disapprove requests for leave and telework arrangements.

B. The manual version of the data, in the form of supporting documents (if and where applicable) are kept in locked cabinets, accessible only by the designated HR staff members.

15 - For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable) see the data protection notice

ERA staff are informed about the e-HR system and the registration of (special) leaves and telework scenarios and the data involved during an induction session within the first days after having taken up duty at ERA. A specific privacy statement is accessible on a dedicated ERA Intranet site. (Privacy statements will be automatically generated from the new data protection register under development).

That statement contains information concerning the purpose of the processing, the categories of data processed, the recipients of the data, the existence of a right of access to and the right to rectify data and the procedure for servicing those rights, the data retention period, the identity of the controller and the right of recourse to the DPO and the EDPS.

ERA staff are instructed on how to use Leama and on how to introduce, correct and verify requests / information on their leaves and telework arrangements. Every ERA staff member can access / consult / introduce his/her own Leama data from outside and inside the organization 24 hours a day.

This allows the staff member to verify that the data is correct and, should this not be the case, to correct it him/herself or request correction to the designated HR staff members. In case of a technical complication with the tool, a designated IT staff member is called upon by the designated HR staff member.

In cases where data are linked to pecuniary rights of staff members, these data are validated by designated HR staff members.

All members of staff have secure access to their own personal Leama platform in order to check/verify/consult its contents.

Any amendment/alteration/modification/correction to the personal leave data must be duly justified introduced by the staff (via the Controller for corrections / deletions if applicable) and executed by the designated actors in the HR team.

Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of individuals with regard to the processing of personal data by the Union Institutions, Bodies, Offices and Agencies and on the free movement of such data safeguards the right to access personal data and to require the Controller to rectify without delay any inaccurate or incomplete personal data. The data subject also has the right to require the Controller to erase data if the processing is unlawful. For this, the data subject needs to contact the Controller by email (put in copy the designated HR staff member). The Controller shall deal with the request for rectification of data within one month from the introduction of the request. As far as requests for blocking and erasure, the Controller disposes of three calendar months to give follow up to the request from the moment of its reception. Furthermore, the data subject is also free to address to the ERA Data Protection Officer at any time, using the following contact address: [DataProtectionOfficer@era.europa.eu](mailto:DataProtectionOfficer@era.europa.eu).

15a - Data subject rights

Right to have access

16 - Legal Basis

ERA-ED-DEC-730-2013 ; #Implementing rules; Staff Regulations and CEOS and implementing Rules;

17 - Lawfulness of processing

Article 5 b) of Regulation (EU) 2018/1725 The processing is necessary to ensure compliance with the applicable provisions on the full scope of leave possibilities, part-time work, telework.

18 - Data minimisation

The data are needed

- To manage and monitor the administration of ERA statutory staff, SNEs and trainees pertaining to annual leave entitlements and consumption, special leave, travelling time, parental leave, part-time work, leave on personal grounds, maternity leave.
- To manage and monitor the administration of ERA statutory staff & SNE's pertaining to telework.  
in compliance with the applicable provisions in the SRs and IRs.
- To produce anonymous statistical data regarding annual leave, special leave, travelling time, parental leave, part-time work, leave on personal grounds, maternity leave;
- To assist the management of ERA to better organise the working conditions;
- To produce nominative reports regarding leaves by authorized persons in a managerial position or HR staff.

19 - Accuracy

- For sick leaves with medical certificates: the medical service endorses the justified absence via the medical certificate submitted by the staff member and informs the designated HR actors.
- For annual leave/travelling days/days for age/days for no of years in service/grade/special leaves (justified by supporting documents)/sick leave without medical certificate: the e-tool is tailor made in line with the SRs and IRs thereby ensuring staff cannot benefit from excessive leave days.

20 - Threshold assessment

NA

21 - Special category data

NA

22 - DPIA

NA

23 - Link to the Threshold assessment-Risks

24 - Other related documents