

REGISTER NUMBER: 358

NOTIFICATION FOR PRIOR CHECKING

Date of submission: 15/04/2008

Case number: 2008-239

Institution: Court of Auditors

Legal basis: article 27-5 of the regulation CE 45/2001⁽¹⁾

(1) OJ L 8, 12.01.2001

INFORMATION TO BE GIVEN⁽²⁾

(2) Please attach all necessary backup documents

1/ Name and address of the controller

John Sweeney, office K1/105, European Court of Auditors

2/ Organisational parts of the institution or body entrusted with the processing of personal data

Head of Division of Audit Methodology & Support Unit (AMS), CEAD Group.

3/ Name of the processing

ART: ASSYST Reconciliation Tool

4/ Purpose or purposes of the processing

Facilitate individual auditors and their Heads of Unit to reconcile their time recorded in ASSYST (the Audit Management System) with the Flexi-time system.

5/ Description of the category or categories of data subjects

Officials and temporary agents who have access to ASSYST. (See 4/ above.)

6/ Description of the data or categories of data (*including, if applicable, special categories of data (article 10) and/or origin of data*)

Family name, First name, Division/Unit, time recorded in ASSYST and number of hours from the Flexi-time system.

7/ Information to be given to data subjects

Everybody who will have access to the tool will be given a guideline on how to use it and the possibility to attend a presentation of it.

8/ Procedures to grant rights of data subjects (*rights of access, to rectify, to block, to erase, to object*)

This tool will have the same security set up as the two underlying system sources. An auditor logging on to the ART tool will have the same read access, i.e. only data for her- or himself. A Head of Unit or someone who the Head of Unit has delegated will have read access to the data of the Unit.

9/ Automated / Manual processing operation

The ART tool will retrieve total hours recorded per day per person in ASSYST and compare these with the total hours per person from the Flexi-time system. The result is presented in a table format. No further details are available. It is an automated operation triggered by the users. At present, this reconciliation is being done manually by individual auditor staff.

10/ Storage media of data

The table can be printed. No other storage is foreseen. It will be up to each user to save her or his tables as needed. The system doesn't store any data at all.

11/ Legal basis and lawfulness of the processing operation

Art. 5a of reg. 45/2001.

12/ The recipients or categories of recipient to whom the data might be disclosed

Only the individual auditors and their Heads of Units who will in any case have the same access to the tool.

13/ retention policy of (categories of) personal data

N/A. The ART tool cannot store any data.

13 a/ time limits for blocking and erasure of the different categories of data

(on justified legitimate request from the data subject)

(Please, specify the time limits for every category, if applicable)

The Flexi-time system displays the data for the current and previous month. The data in ASSYST is available for three years. The ART tool concerned cannot store any data.

14/ Historical, statistical or scientific purposes

If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification,

There are no such purposes foreseen.

15/ Proposed transfers of data to third countries or international organisations

N/A

16/ The processing operation presents specific risk which justifies prior checking (*please describe*):

AS FORESEEN IN:

Article 27.2.(a)

Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,

Article 27.2.(b)

Processing operations intended to evaluate personal aspects relating to the data subject,

Article 27.2.(c)

Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

Article 27.2.(d)

Processing operations for the purpose of excluding individuals from a right, benefit or contract,

Other (general concept in Article 27.1)

17/ Comments

The Court has a Flexitime system in which the staff clock-in when arriving and clock-out when leaving. Total hours per day is recorded in this system. An individual person has read-access only to his or her personal record. The Heads of Unit have read access to the data for her or his staff. The Court also has a Audit Management system called ASSYST in which the auditors document their audits which includes recording time spent against audit tasks. Each auditor has read access only to her or his time reports in ASSYST. The Heads of Unit and those who have so called management access have read access to the time reports in that unit concerned. This security setup which limits read access is an important aspect of ASSYST. The total time recorded in ASSYST per person and per day should more or less reflect the hours per day in the Flexitime system. The ART tool will facilitate that reconciliation of the data between the two systems. The ART tool will not give read access to more data than the person has in the two source systems.

PLACE AND DATE: 15.4.2008

DATA PROTECTION OFFICER: Jan KILB

INSTITUTION OR BODY: Court of Auditors