

**REGISTER NUMBER: 815**

**NOTIFICATION FOR PRIOR CHECKING**

Date of submission: 15/12/2011

Case number: 2011-1164

Institution: ENISA

Legal basis:

*(1) OJ L 8, 12.01.2001*

**INFORMATION TO BE GIVEN<sup>(2)</sup>**

*(2) Please attach all necessary backup documents*

**1/ Name and adress of the controller**

Udo Helmbrecht, Executive Director  
P.O. BOX 1309  
71001 HERAKLION  
GREECE

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

The following organisational units and individuals are responsible for the data held in the MATRIX system.

1) ADMIN Department (ADMIN)

The ADMIN department is responsible for:

- Financial data input from the ABAC system.
- Data relating to projects and activities under the control of the ADMIN department.

2) IT Services and Facilities Management Unit (ITFMU)

The ITFMU is responsible for:

- System configuration data including access rights.
- Data relating to projects and activities under the control of the ITFMU unit.

3) Public Affairs Unit (PAU)

The PAU is responsible for:

- Data relating to projects and activities under the control of the PAU unit.

4) The Technical Competence Department (TCD)

The TCD department is responsible for:

- Data relating to projects and activities under the control of the TCD department.

**3/ Name of the processing**

System for the management of projects and activities within ENISA.

The underlying support tool is known as the MATRIX application.

**4/ Purpose or purposes of the processing**

The purpose of the processing is as follows:

- To define all major activities and projects in a single, centralised location.
- To define timescales and budget allocation at a level of granularity consistent with day-to-day management.
- To follow-up on a regular basis on progress according to plan and budget utilisation.
- To enable consistent reporting of aggregated project data to the ENISA Management Board.

**5/ Description of the category or categories of data subjects**

ENISA statutory and non statutory staff, contractors

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

The following categories of data will be processed:

- Definition of projects and activities to be undertaken by staff members.
- Time spent on different projects and activities.
- Financial expenditure on different projects and activities.

**7/ Information to be given to data subjects**

- a) A series of training sessions has been organised to make staff aware of the system and how ENISA intends to implement it in order to track progress and budget expenditure of activities and projects. Staff have the opportunity of asking relevant questions at these sessions.
- b) Information on the implementation of MATRIX and office presence monitoring by ED Decision ENISA/DIR/UH/em/2011/1160 (see attached) to the attention of all ENISA staff members, available at the intranet
- c) Information on the decision of the implementation of MATRIX and general introduction to it has been provided by the ED in staff meetings and 2 mandatory information sessions

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

The rights of the data subjects are being granted in their ways of right of access, rectification, rights to block, erase or to object by addressing themselves (by email or orally). All staff will be able to view their own projects and activities and their own timesheet data, therefore right of access is granted. They also have rights to rectify, block, erase and object their data themselves/by addressing their line managers. This information will be encoded by HR accordingly.

**9/ Automated / Manual processing operation**

A brief description of how the system functions follows:

- Data characterising activities and projects is input into the system by the appropriate line manager. This data is essentially a description of the work item to be carried out, together with resource and budgetary estimations and planning. The annual work programme and standard operating tasks are used as a basis for doing this.
- Staff is assigned to activities or projects in line with planning assumptions.
- Staff record the use of their time via a timesheet facility, which records how much time has been dedicated to which activity.
- Line managers use the timesheet data to track progress and to make planning decisions.

**10/ Storage media of data**

The data is stored online in the MATRIX application and is also stored on backup media.

**11/ Legal basis and lawfulness of the processing operation**

This activity is justified by the ENISA founding regulation and is considered essential for carrying out our daily work (note here that only the tool has changed).

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

Data in the system will be available to staff as follows:

- All staff will be able to view their own projects and activities and their own timesheet data (but will not be able to see the timesheet data of other staff).
- All staff will be able to see the general planning outline and definition of activities (which is published in the annual work programme – a public document).
- Line managers will be able to see the timesheets of those staff members that report into them.
- The Executive Director and the head of TCD (acting as his backup in this capacity) will be able to see all data so that Agency wide planning decisions can be made.

**13/ retention policy of (categories of) personal data**

Data will be kept on line for the period in which the corresponding tasks and activities are still significant . For activities in the work programme, this means that such data will be on line until the programme has been completed.

Data will be kept on backup media in line with ENISA backup policy.

**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)*

As the system only stores data relating to projects and activities, this will be done on an as required basis and in line with management needs.

Staff are expected to keep their own data up to date and to change it themselves in case of any inaccuracies.

**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,*

The following apply:

- Data entered via timesheets will be used to optimise the planning process. In this sense, aggregated data will be used to improve the effectiveness of our estimation process.
- Individual data will be used to facilitate management decision making (e.g. which staff are assigned to which tasks) and also as input to the annual appraisal process.

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

No such transfers apply.

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

Implementation of the MATRIX system does not entail any significant new risks for the Agency as the data that it holds is being collected in a less systematic form at the current time.

The only significant change is that this data is now accessible via a single activity management tool.

**17/ Comments**

See attached ED Decision ENISA/DIR/UH/em/2011/1160 and Help-manual on Matrix

PLACE AND DATE: HERAKLION 15/12/2011

DATA PROTECTION OFFICER: Ulrike LECHNER

INSTITUTION OR BODY: European Network Information Security Agency

*To be filled out in the EDPS' office*