

*(To be filled out in the EDPS' office)*  
**REGISTER NUMBER: 1220**

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**NOTIFICATION FOR PRIOR CHECKING**

**DATE OF SUBMISSION: 05/02/2014**

**CASE NUMBER: 2014-0173**

**INSTITUTION: COUNCIL OF THE EUROPEAN UNION**

**LEGAL BASIS: ARTICLE 27-5 OF THE REGULATION CE N° 45/2001<sup>(1)</sup>**

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

1/ NAME AND ADDRESS OF THE CONTROLLER

Schilders Dirk  
Director  
DGA CIS  
9989

2/ ORGANISATIONAL PARTS OF THE INSTITUTION OR BODY ENTRUSTED WITH THE PROCESSING OF PERSONAL DATA

DGA CIS 9390 (Mr F. Drezet)

3/ NAME OF THE PROCESSING

EPM - Enterprise Portfolio Management Tool

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<sup>1</sup> OJ L 8, 12.01.2001.

<sup>2</sup> **Please attach all necessary backup documents**

4/ PURPOSE OR PURPOSES OF THE PROCESSING

The overall strategic objective is to increase efficiency and improve planning and monitoring whilst enhancing DGA CIS ability to deliver against its remit and core values by allowing a better prioritisation and optimisation of the IT investments of the GSC, an alignment of its services to the business needs and an improvement of its quality of service with equal or potentially decreasing IT spending budget.

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

Officials of the GSC, Other servants, Service providers

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA (*including, if applicable, special categories of data (Article 10) and/or origin of data*).

Identification data: user name, internal/external flag (from Active Directory). Contact data: email (from Active Directory), unit, sector, office, function, activity status, end of activity date, end of contract date (from Meta Directory). Project data: Project Number, Program Name, Project Name, Unit, Sector, Investment Type, Project Mandatory (Yes/No), Project Start Date, Proposed Start, Project End Date, Status, Data as of (yyyy-mm-dd), Project Description (including final product), Project Sponsor, Project Manager, Total Planned budget, Total Mandays, Business Units Impacted, Project Life Cycle Phases including resource planning (WBS including milestones and deliverables), Value Assessment, Risk Assessment, Project % Completion (calculated), Activity Completion (calculated), Activity for the next period (calculated), Resource Consumption (calculated). Time related information: For each staff member or consultant participating in a project or in recurring activity (maintenance & support operations): Time spent on project activities, per working day, Holidays, Non-working Periods, Resource Availability (calculated).

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

- DGA CIS communication to staff on 19/12/2013
- Information Note for data subjects
- Communication via the hierarchical channel (Heads of Unit).

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS  
(Rights of access, to rectify, to block, to erase, to object)

The data subject may request to his or her Head of Unit to have the data blocked or erased within two weeks (without counting holidays or absence) after receiving the data. An acknowledgement of receipt will be sent within 5 working days and the reply will be sent no later than 15 working days of the date of receipt of that request. The controller may, however, send a duly justified holding reply. The deadline for the correction, blocking or deletion of data may not exceed 10 working days, with the period starting only from the date the final decision is taken on the request to block or erase data (an administrative decision taken by the GSC or, in the event of dispute, a decision taken by the European Data Protection Supervisor or the competent court).

9/ AUTOMATED / MANUAL PROCESSING OPERATION

The EPM system is conceived to manage the planning, implementation and monitoring the projects executed by DGA CIS. The Project Management Office (PMO) staff manages the human resource pool of the system. The information related to human resources is stored in EPM (see paragraph 1.3). When a project has been approved, the designated project manager (PM) introduces the project in EPM. The information entered includes project description, project activities, schedule and allocated hours to human resources (project team members). The project team is validated by the Director/Heads of Unit. During the execution of the project:

- The project team members report the time spent on their tasks, per working day, as well as their planned holidays and non-working periods (e.g. training, sickness, etc) on a weekly basis.
- The project manager monitors the progress of the project. If needed, the activities, the schedule and the project team structure are revised. Reports provide information on project progress, resource consumption, resource availability, portfolio status and timesheets. The processing is automated:
- A part of the information is imported from the Active Directory of the GSC: user name, email, official/external flag.
- A part of the information is imported for the Meta-Directory of the GSC: unit (posting), function (denomination), activity status (active, detached, etc), end of activity date, end of contract date, office.
- A part of the information is entered via on-line forms: time spent on activities (per working day), task completion (%), holidays and non-working periods.
- A part of the information is generated by the system: human resource availability, project status information, project completion (%), activity completion, activity for the next period, resource consumption, etc. The information is stored on the storage system (set of hard disks) in the data centre of the GSC.

10/ STORAGE MEDIA OF DATA

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

Article 240(2) of the Treaty on the Functioning of the European Union (TFEU) and Article 23 of the Rules of Procedure of the Council; Article 235(4) of the TFEU and Article 13 of the Rules of Procedure of the European Council. Article 5(a) of Regulation (EC) No 45/2001. This processing is necessary for the management and function of the General Secretariat of the Council and accordingly is necessary for the performance of a task carried out in the public interest by the Council.

12/ THE RECIPIENTS OR CATEGORIES OF RECIPIENT TO WHOM THE DATA MIGHT BE DISCLOSED

A Project Team Member has access to his/her identification data, contact data and time related information. A Project Manager has access to:

- his/her identification data, contact data and time related information;
- project data of the projects he/she manages;
- time related information of human resources assigned to projects he/she manages. A Head of Unit/Sector/Office, or equivalent Head of Unit has access to:
  - his/her identification data, contact data and time related information;
  - project data of the projects of his/her Unit/Sector/Office;
- time related information of resources assigned to projects of his/her units. The Director and Project Management Office (PMO) staff have access to:
  - his/her identification data, contact data and time related information;
  - all project data;
  - all time related information.

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

Personal data will be stored for a period not exceeding 3 years after the end of the project. After the time limit, the personal data will be destroyed or anonymised.

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS

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

See point 8.

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.*

None

15/ PROPOSED TRANSFERS OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

No

16/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING (*Please describe*):

The processing includes data concerning the hours spent by each member of the team on the project, per working day, as well as absences. This is not intended to be used for evaluation of the staff member, but, nevertheless, it entails some monitoring of the performance of each project team member as part of the overall project monitoring and follow up.

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

No

PLACE AND DATE: Brussels, 5 February 2014

DATA PROTECTION OFFICER: Carmen López Ruiz

INSTITUTION OR BODY: Council of the European Union