

*(To be filled out in the EDPS' office)*

**REGISTER NUMBER: 1232**

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**NOTIFICATION FOR PRIOR CHECKING**

**DATE OF SUBMISSION: 24/04/2014**

**CASE NUMBER: 2014-0474**

**INSTITUTION: GSA EUROPEAN GNSS AGENCY**

**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

European GNSS Agency, Janovskeho 438/2, 17000 Prague, Czech Republic

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

Human Resources

3/ NAME OF THE PROCESSING

HR software EUHR Allegro

4/ PURPOSE OR PURPOSES OF THE PROCESSING

Management of personal data in relation to the procedures carried out in EUHR Allegro.  
Data is processed for the purposes of keeping record of details of staff members and establishment and support of their rights.

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

The categories of persons concerned are temporary and contract agents employed by the Agency.  
Limited for seconded national experts, trainees and interimaies.

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

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

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA

*(including, if applicable, special categories of data (Article 10) and/or origin of data)*

- name, last name, personnel number, birthdate and address of the staff members
- administrative career, contracts and working conditions
- entitlements
- name, last name, birthdate of spouse and dependants (if applicable)
- data related to absence and time management.

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

Individuals are informed about their rights and personal circumstances determining their rights and entitlements relating to annual leave entitlements by provisions in Staff Regulations (SR) and Conditions of Employment of Other Servants of the EU (CEOS) by decision by PMO (AIPN) outlining their rights and entitlements. Privacy Statement (attached) on EUHR Allegro will be published on Allegro and on common platform for HR on Sharepoint.

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

*(Rights of access, to rectify, to block, to erase, to object)*

Data subjects are automatically granted read-only access to their data upon taking up duty with the GSA. They have a right to ask for an update or correction at any time to an HR responsible staff member.

9/ AUTOMATED / MANUAL PROCESSING OPERATION

Automated and Manual: Supporting documents may be submitted via electronic means and/or paper copy. They are checked certified correct against the original (if applicable) by HR. The documents are then processed following their aim, either by the GSA HR department only or by PMO.

10/ STORAGE MEDIA OF DATA

Data are stored online in a HR database - Allegro.  
Paper copies and electronic files are stored in the Human Resources Department Offices in locked cupboards accessible only by staff of Human Resources Department and in a secure electronic database HR SharePoint.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

Staff Regulations

Decision N. GSA/2012/HR/LEG/OED/653345 - EUHR Allegro N.1 on the implementation of the electronic tool for HR management "EUHR ALLEGRO"

Decision N. GSA/2012/HR/LEG/OED/653096 - EUHR Allegro N.2 on access rights, delegations and authorization in "EUHR ALLEGRO"

By analogy: Common Commission-level retention list for European Commission (SEC(2007) 970)

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

HR department, Appointing Authority, Line Management, PMO and Legal Department (in justified cases only). Civil Service Tribunal, the EDPS, OLAF, the European Ombudsman (in case of complaint), the Court of Auditors and the Internal Audit Service (in case the processing is being audited).

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

Data related to the personnel profile (=personnel file): for up to 8 years after the extinction of all rights of the person concerned and of any dependants, but until at least 120 years after the date of birth of the interested party.  
Data related to annual leave: 3 years

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)*

Two weeks after request

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)*

N/A

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)*

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)*

Yes, in compliance with Article 44 of the Staff Regulations.

Other (general concept in Article 27.1)

17/ COMMENTS

PLACE AND DATE: PRAGUE, 24/04/2014

DATA PROTECTION OFFICER: MS. TRIINU VOLMER

INSTITUTION OR BODY: GSA EUROPEAN GNSS AGENCY