



GIOVANNI BUTTARELLI
ASSISTANT SUPERVISOR

Mr Jobst NEUSS
Data Protection Officer
European Investment Fund
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Brussels, 02 October 2013
GB/MV/sn D(2013)2171 C2013-0349
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correspondence

Subject: Leave and Flexitime - notification of data processing

Dear Mr Neuss,

On 27 March 2013, you sent a letter to the European Data Protection Supervisor ("EDPS") in order to clarify the state of play of the European Investment Fund ("EIF") with regard to its compliance in the context of the processing of personal data on leave and flexitime following the adoption by the EDPS, **of the Guidelines on Leave and Flexitime** (the "Guidelines") on 20 December 2012.

We take note, as stated in your letter, that the rules and procedure for leave and flexitime at the EIF are set up by the European Investment Bank ("EIB") and followed by both institutions of the EIB Group, the EIB and the EIF respectively. You also state that personal data on leave and flexitime are processed within the Time management system, managed by the Personnel of the EIB on behalf of both EIB and EIF and that it has been notified by the EIB Data Protection Officer by date of 26 January 2006 and amended in 2007 and 2012 (Case 2004-0306¹ and 2007-0373²). These cases, following the adoption of specific prior-checking opinions, have been closed in the EDPS register.

¹ Opinion of 26 June 2006 on the notification for prior checking regarding the Gestion du Temps (GDT) (Time Management).

² Opinion of 3 August 2007 on a notification for prior checking on the modification of the data processing operations concerning "gestion du temps" and "medical records".

There is therefore no need for a new analysis of the same processing operations and we have decided to **close this case**. However, shall in the future the EIB Group (covering EIB and EIF) modify the processing operations on leave and flexitime in a sense that there would be an impact in terms of data protection, the EDPS invites you to consult him again and if necessary to notify him of the changes.

Thank you for your collaboration.

(signed)

Giovanni BUTTARELLI

Cc: Mr Alberto SOUTO DE MIRANDA, Data Protection Officer, EIB