

REGISTER NUMBER: 834

NOTIFICATION FOR PRIOR CHECKING

Date of submission: 25/01/2012

Case number: **2012-0090**

Institution: **FRA**

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 adress of the controller:

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

Administration and HRP departments

3/ Name of the processing

MATRIX application (PM, ABB, BM modules)

4/ Purpose or purposes of the processing

The processing relates to the personnel related information processed by the MATRIX application modules as follows:

1. The Project Management module (PM) includes the management of projects. Within the projects the staff are allocated to specific tasks.

The allocation of tasks to staff is available to all staff members and related reports exist to check the allocated time of staff on project and non-project(meetings, training etc) related tasks.

2. The ABB module is used by the staff members to report the time they spend on project and non-project related tasks. It is also used to allow the calculation of available hours that can be used as flexitime within a period as defined by the related policy.

The ABB staff reports are also used to report on the time spend by each staff throughout a calendar year on specific areas and check whether the actual allocation deviates with the planned time included their Career Development Plan (CDP). This are reported in the Career Development Review (CDR).

Both forms are annexed.

The reports generated in ABB are available in a cascade manner to fit the purpose i.e.

- The staff member can generate the time spent on tasks assigned to him only
- The Team Leaders (Head of Sector) can generate reports on their own status plus on the staff that are members of his/her team
- The Head of Department (Head of Unit) can generate reports on their own status plus on the staff that are members of his/her department
- The Director can see the time generate reports on their own status plus all other staff.
- The assigned HR staff dealing with related personnel issues can see the time generate reports on their own status plus all other staff.
- The Finance department generates ABB relates reports per area of activity or tasks in an aggregated manner (no staff identification).

3. The Budget module (BM) is used for the budget monitoring of the Agency.

This includes the monitoring of the Title I that relates to salaries.

The calculation of salaries is linked to the staff's personal data, grade, family status etc.

Access to the budget module is restricted to the related HR personnel and the Budget officer that monitors the overall budget

The related ICT staff have system administration rights for the management of the application.

5/ Description of the category or categories of data subjects

Data subjects are staff members(TAs, CAs), DNEs, interim staff.

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

The data collected is the time spent by staff on specific tasks. The time is entered by the data subjects.

Heads of Departments and Teamleaders can view the time spent by these staff under their supervision only.

Finance department is provided with reports that give only aggregated values i.e. time spent on a specific area of activity or task without specifying which data subject worked where. HRP has access to the time spent by each staff member in order to check whether the staff member is eligible to take additional holiday based on the flexitime policy

7/ Information to be given to data subjects

Data subjects have been informed by management concerning the use of ABB and the need to login their time allocation on the assigned tasks. Also reports are available for staff members concerning their time allocation.

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

Data subjects have access to rectify the information provided and erase any information. They can not block or object to the use of the time spent information they provided when used for the purposes defined above.

9/ Automated / Manual processing operation

This is a manual processes with regards to the entry of the timesheet information. There is an automated process provided by the system to provide related reports at personal(staff) and project level.

10/ Storage media of data

Electronic storage. A database is used to store this information which is hosted on the Agency's own data center.

11/ Legal basis and lawfulness of the processing operation

Article 5(a), (b), (c), (d) of Regulation 45/2001

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

The data could be disclosed only to auditing authorities for the purposes an audit or investigation

13/ retention policy of (categories of) personal data

The data is kept for a period of 10 years. This time is calculated based on the fact that the multiannual framework (MAF) of the Agency spans for 5 years and the performance of projects of the previous MAF can be used as lessons learned for the next MAF projects. The reason is due to the fact that time spent is linked to the project and administrative autonomy tasks based on the multi-annual plan of the Agency. The amount of time spent on activities and projects of previous years allows the Agency and its staff to better manage and plan future similar activities.

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 specified above.

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,
See point 13

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

No transfers are foreseen.

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

AS FORESEEN IN:

Article 27.2.(b)

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

17/ Comments

To better understand the MATRIX application a related presentation is provided.

Please note that the MATRIX application was developed by FRA and it is about to be used by ENISA. A related notification was submitted in Dec. 2011 and it is best if there is a combined check.

PLACE AND DATE: 25/01/2012

DATA PROTECTION OFFICER: N. Fikatas

INSTITUTION OR BODY: FRA

To be filled out in the EDPS' office