

### EDPS record of processing activity

Record of EDPS activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

Nr.	Item	Description
		<b>Teleworking</b>
1.	Last update of this record	<b>11/08/2023</b>
2.	Reference number	<b>19</b>
3.	Name and contact details of controller	<p><a href="#">European Data Protection Supervisor (EDPS)</a>  <b>Postal address:</b> Rue Wiertz 60, B-1047 Brussels  <b>Office address:</b> Rue Montoyer 30, B-1000 Brussels  <b>Telephone:</b> +32 2 283 19 00  <b>Email:</b> <a href="mailto:edps@edps.europa.eu">edps@edps.europa.eu</a></p> <p>Responsible department or role:            Data are mainly processed in the <b>EDPS HRBA Unit</b> by the <b>GECO</b> (<a href="mailto:edpsgeco@edps.europa.eu">edpsgeco@edps.europa.eu</a>) and by the line manager concerned.</p> <p>Contact form for enquiries on processing of personal data to be preferably used:  <a href="https://edps.europa.eu/node/759">https://edps.europa.eu/node/759</a></p>
4.	Name and contact details of DPO	<a href="mailto:dpo@edps.europa.eu">dpo@edps.europa.eu</a>
5.	Name and contact details of joint controller (where applicable)	
6.	Name and contact details of processor (where applicable)	By virtue of the EDPS-European Commission (EC) SLA, the EC is a data processor for the processing of personal data of EDPS staff in the context of the provision by DG HR of the



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		<p>information system supporting the telework management process (i.e. SYSPER2) and related services.</p> <p>More specifically, the HR service in charge is the DG.HR.A.3 Processes, IT &amp; Reporting: <a href="mailto:HR-MAIL-A3@ec.europa.eu">HR-MAIL-A3@ec.europa.eu</a>.</p>
7.	Purpose of the processing	<p>Personal data are processed in order to manage telework (including the related requests) of EDPS staff members in accordance with the <a href="#">EDPS Decision on working time and hybrid working dated 21 April 2022</a>.</p> <p>Syper is used in order to manage technically telework requests. Please refer to the <a href="#">EC privacy statement on SYSPER2 - Time Management: Time Recording, Absence Management and Teleworking</a> for more information on processing of personal data via SYSPER2.</p>
8.	Description of categories of persons whose data the EDPS processes and list of data categories	<p><u>Categories of data subjects:</u></p> <p>All EDPS Staff members that are eligible for teleworking and teleworking from abroad under the <a href="#">EDPS Decision on working time and hybrid working dated 21 April 2022</a>.</p> <p><u>Categories of personal data processed:</u></p> <p>Personal data processed when submitting a telework request or related to the type of telework: surname, first name, personnel number, dates of telework, status, unit, place of telework (e.g. from abroad), information on whether the person is working at the office or teleworking on a given day.</p> <p>In addition to the above-mentioned data, the following personal data will be processed (depending on the type of request):</p> <ul style="list-style-type: none"> <li>- As part of a request to the line manager for extra teleworking days in case of temporary health issues not requiring sick leave but impacting on the staff member mobility: the existence of any such a temporary health issues (but not the details of the temporary health issue);</li> <li>- As part of a request for extra telework days submitted by the staff member with a written request to the EDPS Secretary-General, after consultation with the line manager: in addition to identification data, the staff member must provide a reason for the request. The reasons for the</li> </ul>



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		<p>request may include: specific personal and family situations / disability or disability of a dependent person / health issues or health issues of a dependent person / long journeys or difficult access by public transport. This data will be used only for assessing the authorisation required by the staff member;</p> <p>- As part of a request for additional telework days from abroad submitted by the staff member with a written request to the EDPS Secretary-General, after consultation with the line manager: in addition to identification data, the staff member must provide a reason for the request. The reasons for the request may include: specific difficult family situations related to the staff member's health or related to the staff member's dependent's health, disability or elderly age / serious illness of a family member. This data will be used only for assessing the authorisation required by the staff member.</p>
9.	Time limit for keeping the data	<p>- Personal data related to telework is kept in SYSPER2 for five calendar years.</p> <p>- Personal data included in the written requests to the EDPS Secretary-General for extra teleworking days and additional telework days from abroad is kept for a maximum of 2 months after the decision on the request and deleted thereafter.</p>
10.	Recipients of the data	<p>- Personal data related to telework can be accessed by the line managers managers (and the persons delegated by them) of the concerned staff member, the Head of the HRBA unit, the AIPN and the EDPS GECO.</p> <p>- Information on whether the staff member is working at the office or teleworking on a given day can be accessed by all EDPS colleagues via SYSPER2.</p> <p>- The requests for extra teleworking days in case of temporary health issues not requiring sick leave but impacting on the staff member mobility are submitted to the line manager.</p> <p>- Written requests for extra teleworking days or additional teleworking days from abroad are sent to the EDPS Secretary-General after consultation with the line manager, while the HRBA Head of Unit is informed of their outcome.</p>



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11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No.
12.	General description of security measures, where possible.	<p>Only the staff member, the line managers concerned and the GECO (as well as the Secretary-General in the particular cases mentioned above) have access to the requests done by the staff member.</p> <p>Security measures implemented by DG HR/DG DIGIT who manages the EC tool SYSPER2 are applicable.</p>
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	Data protection notice is published on the EDPS intranet.

