

# EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

1	Title of the processing activity	<b>Time management of Local Agents in EU Delegations – e-TIM</b>
2	Update of the record (last modification date)	04/01/2024
3	Register reference number	2741
4	Identity and contact details of the Data Controller Joint Controller (if applicable) Data Processor (if applicable)	European External Action Service Rond Point Schuman 9A, 1046 Brussels, Belgium Data Controller contact entity: RM.BHR.5 Functional mailbox: LOCAL-AGENTS@eeas.europa.eu
5	Identity and contact details of the Data Protection Officer	EEAS Data Protection Officer (DPO): Emese Savoia-Keleti. SG.AFFGEN.DPO Functional Mailbox of the DPO: DATA-PROTECTION@eeas.europa.eu
6	Purpose of the processing activity	<p>The purpose of this data processing activity is to manage presence and absence of local staff in EU Delegations.</p> <p>Description:</p> <p>e-TIM is the time management system for local staff in EU Delegations. This management system enables local staff to encode their working hours and absence and helps administration to manage timesheets, annual leave, special leave, medical leave and its approval (or rejection).</p> <p>This system offers a complete set of features to manage presence registration and absence validation of local agents in EU Delegations. Local staff members register their presence and absence in the e-TIM application and authorising managers validate these encodings.</p> <p>The e-TIM system also offers a workflow (a sequence of steps performed by authorising managers for approving calendar change, absence request, monthly timesheet etc.)</p> <p>Work patterns (Flexitime, Fixtime, and Overtime) and leave entitlements (annual leave, special leave, and medical leave) are also configured and encoded.</p>

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7	Legal basis and lawfulness	<p><b>Lawfulness</b></p> <p>The processing of your personal data is necessary for the performance of a task carried out by the EEAS in the public interest, in particular for the management and functioning of the EEAS [Article 5(1)(a) of Regulation (EU) 1725/2018] as referred to in Recital 22 thereof.</p> <p>Legal reference:</p> <p>Chapter 5 of the Joint Decision C(2019)5686 and subsidiary decisions on Working time for local staff ADMIN(2020)16 and Special paid leave ADMIN(2020)30;</p> <p>Articles 6 and 7 of the Framework Rules and relevant Articles of the Specific Conditions of Employment (SCE) adopted for individual Delegations.</p>
8	Categories of individuals whose data is processed - Data subjects	<p>Data are processed from the following individuals or groups of people:</p> <p>Local staff using e-TIM</p> <p>Authorising managers authorising absence and validating presence</p> <p>Other staff posted in EU Delegations (ie officials, contractual agents etc.)</p> <p>e-TIM administrators</p>

9 Categories of data - Data processed

Data, including personal data, are the following:

Local staff:

First name

Surname

Function group

Work pattern (fix-time, flexitime, overtime)

Leave entitlement

Presence and absence and authorisation data for local staff

Any further personal data submitted by the local staff in relation to their request

Authorising managers, other staff posted in EU Delegations and e-TIM administrators:

First name

Surname

10	Recipients of data – Access to data	<p>In EU Delegations:</p> <p>Head of Delegation or delegate (ie. Deputy Head of Delegation);  Head of Administration;  Heads of Section;  Other EU Delegation staff members involved in the management of approval processes such as timesheet approval, work pattern approval, rights pattern approval .</p> <p>In HQ:</p> <p>EEAS Division Local Agents (RM.HR.5);</p> <p>EEAS Division Digital Solutions (RM.BS.3) processing data dealing with Security Portal (Security Portal consults the e-TIM data for the purpose of knowing which local agents are present or absent. In case of an evacuation or security incident the information on the approved absence or presence will be retrieved from e-TIM);</p> <p>EEAS Division Support to Delegations (RM.BS.4) acting as Head of Administration;</p> <p>EEAS Division Inspection (SG.AFFGEN.3);</p> <p>EEAS Division Administrative Legal Issues (SG.AFFGEN.2).</p>
11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	N/A
12	Time limit for keeping the data - Retention period	Data is retained for a period of 15 years after the end of the employment period for all employment-related matters for local staff.

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13	Data Storage	<p>Data are stored on secured servers of the EEAS and the European Commission.</p>
14	General description of security measures	<p>Appropriate organisational and technical measures are ensured according to Article 33 of Reg. (EU) 2018/1725. The collected personal data are stored on servers that abide by pertinent security rules. Data is processed by assigned staff members. Access to specific files requires authorisation. Measures are provided to prevent unauthorised entities from access, alteration, deletion, disclosure of data. General access to personal data is only possible to recipients with a UserID/Password.</p> <p>Only the Division EEAS Division Local Agents (RM.HR.5) has the access right to change data. Physical copies containing personal data are stored in a properly secured manner. Access to the system is via EULogin. EULogin is the European Commission Authentication Service that requires a UserID/password and, when connecting from outside of the network of the EEAS or the Commission, two-factor authentication. The EULogin privacy statement is available here: <a href="https://ecas.ec.europa.eu/cas/privacyStatement.html">https://ecas.ec.europa.eu/cas/privacyStatement.html</a>.</p>
15	Rights of individuals	<p>Data Subjects have the right of access to their personal data and the right to correct their inaccurate, or incomplete personal data taking into account the purpose of the processing. The right of rectification can only apply to factual data processed. Under certain conditions, data subjects have the right to ask the deletion of their personal data or restrict their use as well as to object at any time to the processing of their personal data on grounds relating to their particular situation. The EEAS will consider their request, take a decision and communicate it to the data subject(s) without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary. It is indicated to data subjects that they can find more information with detailed legal references in Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725. In specific cases, restrictions under Article 25 of the Regulation may apply.</p> <p>Data subject may exercise their rights by contacting the data controller entity via: <a href="mailto:LOCAL-AGENTS@eeas.europa.eu">LOCAL-AGENTS@eeas.europa.eu</a></p>
16	Information to data subjects	<p>A Privacy Statement linked to this Record contains information provided to the data subjects.</p> <p>The Privacy Statement is accessible on the Intranet, also on the sub-page dealing with Local Agents, <a href="#">EEAS Intranet – local Agents page</a>.</p> <p>Privacy statement is also accessible in e-TIM.</p>