European Economic
and Social Committee

Record of processing activity
Part 1

Name of the data processing:	Flexitime management
Created on	03/03/2020
Last update	11/11/2020
Reference number	066
Year	2020
1. Controller:	European Economic and Social Committee
2.a) Service responsible	E3 STA
2b) contact details	unit E3 "Working conditions, rights and obligations, pensions" (STA) of the Directorate for Human Resources and Finance – time management team – conges-leave-eesc@eesc.europa.eu
3. Joint controller	
4. DPO: contact details	data.protection@eesc.europa.eu
5. Processor(s) (where applicable)	
6. Purpose(s) of the data processing	

Registering and calculating hours worked by staff
Decision 131/17 A
The Sysper time management module, which processes data relating to daily working hours, enables staff members to record and manage their working hours in such a way as to ensure a better work/life balance. This is done in full compliance with the interests of the service and the statutory and regulatory obligations regarding working hours in general.
This data is not intended to be part of the staff appraisal process.
The main benefits of the Committee's flexitime system are as follows:
[1]   staff have increased flexibility, between 7 in the morning and 8.30 in the evening, in deciding what time they arrive at the office and what time they leave, with a view to working an average of 40 hours per week;
[2]   they may convert any credit hours worked into a maximum of four half-days of recuperation per month, with the agreement of the line manager; and
[3]   may carry over a maximum of 20 credit or debit hours to the following month.
To this end, staff members must register their arrival and departure times as well as lunch breaks every day in the Sysper "presences" module, either in real time using a technical shortcut or manually at a later stage.
They have the option of doing so until the end of the sixth working day following the day on which the hours were worked. If necessary, at the request of the person concerned, the hours worked may be recorded or modified at a later stage by the time management sector. If a lunch break is not recorded, a fixed time of 20 minutes will be deducted automatically.
It is up to the line manager to validate the presences recorded on a monthly basis.

Those who do not participate in the flexitime system are required to work the standard working hours applicable at the Committee.

7. Description of the categories of persons whose data are processed	Processing of data under the flexitime system applies to all members of staff covered by the Staff Regulations (officials, temporary staff and contract staff) as well as seconded national experts (SNEs), i.e. all EESC staff with the exception of trainees and agency staff.
8. Description of data categories processed	

The type of data processed by the Sysper "presences" module includes first and foremost: surname, first name, daily presences (arrival and departure times, lunch break), types of regular absences (annual leave, special leave, parental or family leave, leave on personal grounds, part-time work, professional training, missions, illness, etc.), previously encoded in Sysper and the result of the calculation of presences and absences (monthly balance, recuperations, credit hours, debit hours).

Only data relating to daily hours of arrival and departure are processed directly by the flexitime module. It should be noted, however, that in order to ensure that previously encoded periods of regular absence (annual leave, special leave, parental or family leave, leave on personal grounds, part-time work, professional training, missions, illness, etc.) are offset when calculating the number of hours worked under the flexitime system, the information relating to these absences is automatically included in the Sysper "presences" module. This prevents the data from being encoded twice.

However, data relating to such regular absences is not fully processed (for example, to assess whether or not it is valid) under the flexitime management system.

9. Time limit for retaining the data	The processing procedure is carried out electronically via Sysper and the data is stored throughout the person's career.
10. Recipients of the data	The only people with access to the data recorded in the Sysper "presences" module are: - the staff member concerned, for the purpose of recording arrival and departure times, consulting their balance within the framework of the standard hours and submitting a request for recuperation; - his or her line manager, who is authorised to consult, validate and/or correct the hours recorded and to accept requests for recuperation; - managers in the administration's time management sector, for the purpose of, where necessary, deducting the excess part of an end-of-month debit balance exceeding 16 hours from the annual leave balance (or, if the latter has been used up, from the salary).
11. Transfers of personal data to a third country or an international organisation	Not applicable
12. General description of security measures, where possible	
13. Privacy statement	No hyperlink inserted

	Part 2 Compliance check and risk screening
1.a) Legal basis and reason for processing	☐ (a) necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body ☑ (b) necessary for compliance with a legal obligation to which the controller is subject (see point 1b) below) ☐ (c) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract ☐ (d) the data subject has given consent to the processing of his or her personal data for one or more specific purposes ☐ (e) necessary in order to protect the vital interests of the data subject or of another natural person [Tick (at least) one of the boxes]
1b) Legal basis	The following sources form the main legal basis for processing data under this procedure: - Article 55 of the Staff Regulations (and Articles 16 and 91 of the CEOS) - Decision No 131/17 A, internal rules on working time
2. Are the purposes specified, explicit and legitimate?	Yes
3. Where information is also processed for other purposes, are you sure that these are not incompatible with the initial purpose(s)?	Not applicable
4. Do you really need all the data items you plan to collect?	Yes
5. How do you ensure that the information you process is accurate?	The data is entered and validated by the person concerned and validated by their superior.
6. How do you rectify inaccurate information?	manually upon a substantiated request from the person concerned with the agreement of the line manager.
7. Are they limited according to the maxim "as long as necessary, as short as possible"?	Yes

8. If you need to store certain information for longer, can you split the storage periods?	No
9 How do you inform data subjects?	The persons concerned have access to their data in Sysper.
10. Access and other rights of persons whose data are processed	The persons concerned are entitled to request access to their personal data. They also have the right to ask for the data to be modified or deleted as well as the right to express their own position, to object or to complain. To this end, they may contact the person in charge of processing conges-leaves-eesc@eesc.europa.eu
11. Does this process involve any of the following?	☐ (a) data relating to health, (suspected) criminal offences or other special categories of personal data ☐ (b) evaluation, automated decision-making or profiling ☐ (c) monitoring data subjects ☐ (d) new technologies that may be considered intrusive

Part 3
Linked documentation

1. Links to threshold assessment and DPIA (where applicable)	No hyperlink inserted
2. Where are your information security measures documented?	No hyperlink inserted
3. Links to other documentation	No hyperlink inserted
4. Other relevant documents	