

European Aviation Safety Agency

PERSONAL DATA PROCESSING RECORDS AND COMPLIANCE CHECK LIST

Ref 039 Leave management IT tool

Nr.	Item	Explanation	
	Management of leave and absences (dedicated IT application)		
1.	Last update of this record	1.12.2018	
2.	Reference number	039	
	Part 1 - Article 31 Record		
3.	Name and contact details of controller	Controller: European Aviation Safety Agency, Konrad-Adenauer-Ufer 3, 50668 Cologne, Germany Contact: Head of Human Resources Department; hr.info@easa.europa.eu	
4.	Name and contact details of DPO	dpo@easa.europa.eu	
5.	Name and contact details of joint controller (where applicable)	Not applicable	
6.	Name and contact details of processor (where applicable)	Not applicable	
7.	Purpose of the processing	The purpose of the personal data processing is to ensure that the information on leave and absences is processed in order to ensure the respect of all relevant rules and regulations. EASA records all type of leave & absences (annual leave, sick leave, special leave, maternity leave, medical part-time, parental / family leave, part-time leave, unjustified absences) taken by staff members. All leave and absences are recorded in the dedicated IT application (CATS Portal in SAP). With the exception of supporting documents containing medical information, supporting documents are directly uploaded in the dedicated IT application by the staff member.	
8.	Description of categories of persons whose data EASA processes and list of data categories	EASA processes the data of the following data subjects: - Temporary agents - Contract agents - Seconded National Experts (SNEs) - Paid trainees	



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		Categories of personal data: revealing political opinions (e. g. external activities) revealing religious or philosophical beliefs (e. g. switch of holiday) revealing trade-union membership data related to suspected offences, offences, criminal convictions or security measures (e.g. police certificates) concerning health (including disabilities) concerning marital status (e. g. name of partner) in the form of personal identification numbers concerning the data subject's private sphere concerning pay, allowances and bank accounts concerning recruitment and contracts concerning the data subject's family concerning the data subject's career concerning leave and absences concerning missions and journeys concerning telephone numbers and communications.
9.	Time limit for keeping the data	Collected personal data are recorded and stored, as a general rule, as long as 5 years. Data related to annual leave taken may be kept for up to 2 years, so that days can be carried over from one year to the next. Data related to absences due to illness may be kept for up to 3 years. This can be extended to 5 years in case of dispute. However, files are kept beyond this time-limit if they need to be consulted for the purposes of legal or administrative proceedings (e.g. claims for damages, requests by the Ombudsman, appeals to the Court of Justice) which are still pending when the time-limit expires. Data concerning parental/family leave, are stored in the staff members' personnel files and therefore kept for the same length of time as other documents contained in the staff members' personnel files, i.e. for 10 years as of the termination of employment or as of the last pension payment. Where the timeframe above do not apply, as a rule data will be kept for 5 years (or longer in case of an appeal). The related supporting documents will follow the same storage period.



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10.	Recipients of the data	The Authority authorised to conclude contracts of employment; HR Department, Leave Administrator in the HR Department; line managers concerned (Head of Department, Section Manager, Director) and their sub-delegates; the medical advisors either from EASA and/or medical service from the Commission.
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.	Access to computer system (dedicated IT tool) accessible only to the staff member, Section manager/Head of Department/Director, leave administrator (HR Department). Scanned copy of supporting documents for special leave and sickness leave are directly uploaded in the dedicated IT tool and can only be viewed by the concerned staff member and the Leave Administrator (HR Department). Special access right (Administrator right) in the dedicated IT tool for the HR staff members responsible for the management of leave and absences, specific access right to the data subjects' line manager to record absences on behalf of the data subject.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	See privacy statement