



European Union Aviation Safety Agency

FO Personal data processing records and compliance checklist - Public	Ref # 075
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Nr.	Item	Explanation
HR Consolidated Data Source		
1.	Last update of this record	11/02/2021
2.	Reference number	075
Part 1 – Article 31 of Regulation (EU) 2018/1725 - Record (recommendation: Publicly available)		
3.	Name and contact details of the controller and of the staff member responsible	Controller: European Union Aviation Safety Agency (EASA) Staff member responsible: Section Manager - Employee Services 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 project consists in the creation of a Central Repository of HR data, a data warehouse supported by the SAP Business Intelligence (the “SAP BI”) technology. This data will be used by the designated recipients as specified at point 10. “Receipients of the data”, for periodical reporting and specific analysis. Here below some examples grouped by area of competence: 1. Periodical reporting of the workforce, such as the filled posts, the headcount, the FTE or the title 1 expenses, complemented by contract type/grade/step, the work regime, the organisational unit, the gender, the





		<p>nationality, the age or other personal and organisational data processed to enable the functioning of internal systems/processes (e.g. working time records).. In this context, the user has the possibility to create matrix reports that include various interrelated information;</p> <ol style="list-style-type: none"> 2. Workforce planning, including Single Programming Document (SPD) mandatory reporting, encompassing the staff at a certain date in time plus planned “new-comers/movers/leavers”, but also the staff by contract category/grade, the gender statistic and any other requirement from the EU Institutions (EUI) reporting; 3. Financial planning, including SPD mandatory reporting, specifically the calculation of the title 1 (costs of the staff) for planned workforce. This analysis requires the use of the data that compose the salary base, such as the contract type/grade/step, the work regime and leaves handled as specified at point 8.4, the nationality and place of origin, the marital status, the existence of children with their age and any other information resulting in a salary changed condition. 4. Ad-hoc reports used for accounting purposes. This category includes the reports used for “allocation drivers” of the general and administrative expenses; 5. Data analysis for administrative controls; this area of analysis aims at cross checking the solidity of the personal data, like the precision of the monthly salary slips calculation or the periodical data cleansing aiming at correcting errors/imprecisions. <p>For the purposes described, the recipients have the permission to use the data available in the BI repository; the same level of permission is also granted for the use of the data stored in SAP, by means of the reports offered by the SAP systems itself.</p>
8.	Description of categories of persons whose data are processed by EASA and list of personal data categories	<p>Categories of persons whose data are processed by EASA: All EASA staff: Temporary Agent, Contract Agents, Seconded National Experts, Interim, Trainee and possibly Consultants.</p> <p>Categories of personal data processed:</p> <ol style="list-style-type: none"> 1. Personal identity detail (NUP and personal number, full name, age, nationality and place of origin, gender, marital status, number of children with their age); 2. Contractual and administrative data (contract type/grade/step, cost centre, organisational unit, date of entry into force, date of retirement and date of changed of any personal data condition);





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		<ul style="list-style-type: none">3. Financial data, identified in the pay-slip detailed information complemented by the parameters affecting the financial compensation of the staff;4. Leaves. In this respect, the leave categories are aggregated into combined clusters that prevent the direct link of the leave information with staff personal condition (e.g.: health condition or religious orientation);5. Work regime (full time or any combination of part-time).
9.	Time limit for keeping the data	Data retention period is aligned to the retention period of the original data (and disclosed in the Record they belong to). In fact, the SAP BI Repository receives data from the main HR Data Sources, so any addition, change or deletion on the Main Repository is then reflected on the Reporting storage area. In this context, it is ensured that the SAP BI is not a stand-alone database, but rather reflects the different retention periods applicable to the operational data processed in it.
10.	Recipients of the data	<p>Within the EASA, access is granted to technical staff competent in the field of HR, Administration and Programming & Reporting, in the current organisation identified in the RS1 plus RS4 Departments and ED01 Section, and on a need-to-know basis and within the process they are responsible for. The access is ruled by SAP BI System that provides different levels of access, and restricts specific areas.</p> <p>For Directors and respective designated focal points, the access is granted but with restriction to the area of their organisational unit. For this specific users, where the systems cannot grant a specific area restriction, the access is denied for all the data.</p> <p>Furthermore, the access is given to specific Contractors and EASA experts solely for the purposes of the set-up, development and maintenance of the HR Data Repository and therefore excluding any qualitative or quantitative analysis of the information contained.</p> <p>Access to this data is granted internally only.</p>
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which	No





	safeguards?	
12.	General description of security measures, where possible.	<p>The access is ruled by SAP BI System that provides different levels of Access, and different data areas. In particular, the user access is ruled by a matrix that cross checks the Areas of the Information and, the Level of detail of the Access (specific report that the user is allowed to produce).</p> <p>The system traces and stores all the above information, including login, activity done or changes of the profile. The access to SAP BI requires a combination of Username and Password, equal to the general EASA entry credentials.</p> <p>Industry standard encryption measures are in place for data communication.</p>
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the below privacy statement.	





PRIVACY STATEMENT

HR Consolidated Data Source Ref # 76

1. What personal data do we collect?

We collect the following personal data:

- Personal identity detail (NUP and personal number, full name, age, nationality and place of origin, gender, marital status, number of children with their age);
- Contractual and administrative data (contract type/grade/step, cost centre, organisational unit, date of entry into force, date of retirement and date of changed of any personal data condition);
- Financial data, identified in the pay-slip detailed information complemented by the parameters affecting the financial compensation of the staff;
- Leave related records which are aggregated into combined clusters, thus preventing the direct link of the leave information with staff personal condition (e.g.: health condition or religious orientation);
- Work regime (full time or any combination of part-time).

2. For what purpose do we collect personal data and on which legal basis?

The project consists in the creation of a Central Repository of HR data, technically a system based (the SAP BI) data-store.

This data will be used by the designated recipients as specified in point 10. "Recipients of the data", for periodical reporting and specific analysis.

Here below some examples grouped by area of competence:

- Periodical reporting of the workforce, such as the filled posts, the headcount, the FTE or the title 1 expenses, complemented by contract type/grade/step, the work regime, the organisational unit, the gender, the nationality, the age or other related personal and/or





organizational details processed to enable functioning of internal systems/processes (e.g. working time records).. In this context, the user has the possibility to create matrix reports that include various interrelated information;

- Workforce planning, including Single Programming Document (SPD) mandatory reporting, encompassing the staff at a certain date in time plus planned “new-comers/movers/leavers”, but also the staff by contract category/grade, the gender statistic and any other requirement from the EU Institutions (EUI) reporting;
- Financial planning, including SPD mandatory reporting, specifically the calculation of the title 1 (costs of the staff) for planned workforce. This analysis requires the use of the data that compose the salary base, such as the contract type/grade/step, the work regime and leaves handled as specified at point 8.4, the nationality and place of origin, the marital status, the existence of children with their age and any other information resulting in a salary changed condition.
- Ad-hoc reports used for accounting purposes. This category includes the reports used for “allocation drivers” of the general and administrative expenses;
- Data analysis for administrative controls; this area of analysis aims at cross checking the solidity of the personal data, like the precision of the monthly salary slips calculation or the periodical data cleansing aiming at correcting errors/imprecisions.

The personal data is processed on the following bases:

- Article 5(1)(a) of Regulation (EU) 2018/1725 read in conjunction with recital 22:

‘Processing is 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’, which ‘includes the processing of personal data necessary for the management and functioning of those institutions and bodies.’

- Article 75 of Regulation (EU) 2018/1139 on the establishment and functions of EASA.

3. Who may receive your personal data?





Within the EASA, access is granted to technical staff competent in the field of HR, Administration and Programming & Reporting, in the current organisation identified in the RS1 plus RS4 Departments and ED01 Section, and on a need-to-know basis within the process they are responsible for. The access is ruled by SAP BI System that provide different level of access, and restrict specific areas.

For Directors and respective designated focal points, the access is granted but with restriction to their area of their organisational unit. For this specific users, where the systems cannot grant a specific area restriction, the access is denied for all the data.

Furthermore, the access is given to specific Contractors and EASA experts for the sole purpose of set-up, development and maintenance of the HR Data Repository and therefore excluding any qualitative or quantitative analysis of the information contained.

Access to this data is granted internally only..

Your personal data may be further processed for archiving purposes in the public interest and subject to appropriate safeguards.

4. How long are your personal data kept?

Data retention period is aligned to the retention period of the original data (and disclosed in the record they belong to). In fact, the SAP BI Repository for reporting receives data from the main HR data repositories, so any addition, change or deletion on the main repository is than reflected on the reporting storage area. In this context, it is ensured that the SAP BI has not stand-alone database, with different retention period.

5. What are your rights?

You have the right to request from EASA access to and rectification or erasure of your personal data or restriction of processing.

You also have the right to object to processing of your personal data.

EASA should provide information on action taken on a request within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.





A breach concerning your personal data should be communicated to you under certain circumstances. EASA should also ensure the confidentiality of electronic communications.

6. Who is the data controller and how to exercise your rights?

EASA should exercise the tasks of the data controller for the purpose of these processing operations.

To exercise the mentioned rights, you can contact the controller by sending an email to: hr.info@easa.europa.eu

If you consider your data protection rights have been breached, you can always lodge a complaint with the EASA's Data Protection Officer (dpo@easa.europa.eu) or with the European Data Protection Supervisor: edps@edps.europa.eu.

