

# EEAS PRIVACY STATEMENT – DATA PROTECTION NOTICE

## FOR THE PURPOSE OF PROCESSING PERSONAL DATA RELATED TO 'EEAS Human Resources Reporting services'

### 1. INTRODUCTION

The protection of your personal data and privacy is of great importance to the European External Action Service (EEAS) and to the Delegations of the European Union. You have the right under EU law to be informed when your personal data is processed [collected, used, stored] as well as about the purpose and details of that processing.

When handling personal data, we respect the principles of the Charter of Fundamental Rights of the European Union, and in particular Article 8 on data protection. Your personal data are processed in accordance with Regulation (EU) 2018/1725 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, aligned with Regulation (EU) 2016/679, the General Data Protection Regulation. In this privacy statement you find information about how the EEAS and EU Delegations process your personal data and what rights you have as a data subject.

### 2. PURPOSE OF DATA PROCESSING: Why do we process your data?

Purpose(s) of the processing operation is to provide accurate and up-to-date overview and analysis on the Human Resources management processes with the means of a reporting tool developed specifically to achieve HR management goals.

The overall objective also includes responding to the needs of providing accurate information on staff for relevant services for justified and legitimate purposes.

**Types of reports provided to internal and external users:** Briefings for the EEAS management, Statistical bulletin, Reports on national staff to the respective Member states representations, annual Human Resources report, List of staff for the Staff committee, lists of staff for elections, etc.

#### **Reporting based on HR Management Information Systems**

HR Reporting provides reporting services in the HR domain for the EEAS, based on the HR Management Information Systems provided by the Commission/ DG HR. Users (recipients) of the service include Managers (from Heads of divisions to Directors-General, Managing Directors), HR Managers, and HR practitioners.

#### **Overall Purpose**

Achieving HR management objectives requires the ability to make timely decisions based on reliable facts, and to have access to the corresponding detailed information for the execution of human resource tasks. In the context of an increasingly flexible HR organisation, HR professionals and managers need to have access to personal data on a need-to-know basis under the form of detailed and aggregate reports for performing their duties and managing the workforce effectively. Recipients may have access to personal information only as is appropriate for the type and scope of the task in question. This follows a careful breakdown and separation, as well as implementation, of roles and responsibilities, in line with the internal control standards for effective management.

The control of necessity is performed systematically by the data controller.

#### **Types of reports provided to internal and external users:**

- Briefings
- Statistical Bulletin and monthly web-page update on the EEAS staff counts
- Reporting on national staff for the respective Member states representations
- Human Resources report (annual)
- List of staff for the Staff committee and electoral bureau

HR Reporting does not change existing data processing already notified.

HR Reporting does not process data which would reveal any racial or ethnic origins, any political opinion, religious or philosophical orientations, any membership in trade unions (apart from the registration of specific access rights to Sysper which are offered to members of joint committees only), or any information on the sexual orientation of staff members, therefore HR reporting do not process data falling into the category of Art.10. pursuant to Regulation (EU) 2018/1725.

### 3. DATA PROCESSED: What data do we process?

Data (category or type of data, including personal data) processed are the following:

The domains covered by HR Reporting potentially include all data already notified and contained in HRMIS, including on the following:

I. HR management processes:

- staffing and resources allocation,
- organisational structure,
- forward planning,
- e-CV,
- job analysis,
- staff screening and organisational development,
- management staff,
- working conditions,
- rights and obligations (including welcome office),
- recruitment,
- learning and development,
- appraisal and promotion,
- internal and external mobility,
- equal opportunities,
- social welfare,
- absence management,
- and HR “business process re-engineering” (BPR) exercises

Detailed data included in each report or dashboard may vary according to HR management needs.

II. Data provided to the EEAS Staff Committee and bodies appointed by the Staff Committee may include the following:

- Surname(s) and first name(s)
- Job function
- Statutory link
- Category, Grade, Step
- Seniority in the institution (i.e. date of entry into service), Seniority in the function group and Seniority in the grade
- Gender
- Date of birth
- Nationality
- HQ/DEL entity
- Professional phone number with extension
- Professional e-mail address

HR Reporting does not process data relative to the health of individuals. Data on the management of pecuniary rights, of compliance to ethics provisions, and the management of personnel files are not currently included

### 4. DATA CONTROLLER: Who is entrusted with processing your data?

The data controller determining the purpose and the means of the processing activity is the European External Action Service (EEAS). The EEAS Directorate / Division / EU Delegation responsible for managing the personal data processing under the supervision of the Director / Head of Division / Head of Delegation is the following organisational entity:

**Division HR Policy and Coordination, EEAS BA.HR.1**

### 5. RECIPIENTS OF THE PERSONAL DATA: Who has access to your data?

Recipients of reports (and also users of the automated reporting tools) include human resource managers, agents with specific responsibility for HR management, and also hierarchical superiors of staff and of other persons executing tasks under their responsibility.

Recipients of personal data may be as follows:

- Directors-General and heads of service
- Human Resources Director and Heads of HR divisions
- Members of Middle and Senior Management
- Cabinet of the VP HR (parliamentary requests)
- HR personnel in divisions with responsibility the management of specific HR processes (BA HR), such as members of joint committees concerned with human resources management issues, as well as persons receiving delegations from these persons through their official job functions and duties (decision powers for the distribution of local and central access rights are entrusted to the local HR functions, and to the heads of HR functions in BA HR, respectively), including specifically assigned staff in division BA.HR.1

- Member states representations upon request for national staff employed at the EEAS (reports submitted in a form of Excel/PDF or Word document, no access granted to the IT tools)
- EEAS Staff Committee and bodies appointed by the Staff Committee, upon request (with purpose limitation)
- European Commission relevant services for a specified purpose defined by the controller and recipient
- Joint Research Centre (JRC) for the specific purpose of making available the Public Procurement Management Tool (PPMT) for testing and eventual use by the EEAS
- IT Division, EEAS. BS.3 (access for the purpose of changing the user administrative status and of business requests)
- IT Division, EEAS. BA.3 (limited access for the purpose of technical IT issues to be solved)

Additional information:

- The procedure to grant rights is the one applicable to the source systems (SYSPER and HR-Delegation (former eDelHRM))

Declaration concerning the handling and processing data of confidential and/or personal nature is to be signed by concerned staff members.

Personal data not intended to be transferred to a third country or an international organisation. The information in question will not be communicated to third parties, except where necessary for the purposes outlined above.

#### **6. ACCESS, RECTIFICATION, ERASURE OF DATA: What rights do you have?**

The procedure to grant rights is the one applicable to the source systems (SYSPER and HR-Delegation (former eDelHRM)).

You have the right of access to your personal data and the right to correct any inaccurate or incomplete personal data. The right of rectification can only apply to factual data processed. Under certain conditions, you have the right to ask the deletion of your personal data or restrict their use as well as to object at any time to the processing of your personal data on grounds relating to your particular situation. We will consider your request, take a decision and communicate it to you. For more information, please see Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725. In specific cases, restrictions under Article 25 of the Regulation may apply. If you have questions concerning the processing of your personal data, you may address them to the Data Controller via the functional mailbox:

**EEAS HR REPORTING [HR-Reporting@eeas.europa.eu](mailto:HR-Reporting@eeas.europa.eu)**

#### **7. LEGAL BASIS: On what grounds we collect your data?**

The legal basis of the processing operation at stake is:

- EEAS ADMIN (2016)13 - Decision of the High Representative of the Union for Foreign Affairs and Security Policy of 13/07/2016 on Human Resources Reporting
- C(2015) 618 final COMMISSION DECISION of 10.2.2015 on Human Resources Reporting

Further legal reference:

- Article 15, second subparagraph of Protocol Nr. 7 to the TFEU (Privileges and immunities of the Union) related to data upon request from Permanent Representations of Member States or other similar Member State entities

Good administrative practices in the framework of the Treaty of Lisbon and the Council Decision of 26 July 2010 establishing the organisation and functioning of the European External Action Service (2010/427/EU) available on [http://www.eeas.europa.eu/background/docs/eeas\\_decision\\_en.pdf](http://www.eeas.europa.eu/background/docs/eeas_decision_en.pdf)

#### **8. TIME LIMIT - DATA STORING: For what period and how we process your data?**

The retention periods in the data warehouse are aligned with the retention periods of the source systems (SYSPER and HR-Delegation (former eDelHRM)).

Security of data: 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. Files have authorised access. 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. Physical copies of personal data are stored in a properly secured manner.

#### **9. EEAS DATA PROTECTION OFFICER: Any questions to the DPO?**

If you have enquiries you can also contact the EEAS Data Protection Officer at [data-protection@eeas.europa.eu](mailto:data-protection@eeas.europa.eu).

#### **10. RECOURSE**

You have, at any time, the right to have recourse to the European Data Protection Supervisor at [edps@edps.europa.eu](mailto:edps@edps.europa.eu).