Eurojust record of processing activity

Record of processing personal data activity, based on Article 31 of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC

Part I –Article 31 Record (this part is publicly available)

Nr.	Item	Description
		Management of personal data of Eurojust staff (Temporary Agents, Contract Agents) and Seconded National Experts) in Sysper 2 and stored in ComRef database for the duration of the period of implementation of SYSPER 2 at Eurojust (hereafter referred to as the SYSPER project). The SYSPER project was initiated on 01.01.2017 with the SLA Concerning the collaboration between the Directorate-General for Human Resources & Security (DG HR) and Eurojust and the basic modules are expected to be implemented by Q1 2021. As soon as the SYSPER 2 basic modules are implemented and the system is in use (service phase), a new record will be created.
1.	Last update of this record	
2.	Reference number	HRU-10 (October 2020)
3.	Name and contact details of controller	Head of Human Resources Unit hohrconfidential@eurojust.europa.eu
4.	Name and contact details of DPO	dpo@eurojust.europa.eu
5.	Name and contact details of joint controller	N/A
6.	Name and contact details of processor	• Eurojust staff in the human resources unit (accesses will be granted to each module based on task distribution within HR Unit) hradmin@eurojust.europa.eu hrd@eurojust.europa.eu, recruitment@eurojust.europa.eu • Dedicated staff in DG HR assisting Eurojust with SYSPER implementation
7.	Purpose of the processing	The overall purpose of the processing is to replace the current electronic human resources management system (e-HR) with Sysper2. The two systems will have no interaction and as soon as Sysper2 is in use, the HR Unit will take the necessary steps to

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		decommission e-HR.

SYSPER does not cover recruitment operations as in the Commission recruitment is performed by EPSO. Therefore, Eurojust will continue to use E-Recruitment to manage its recruitment procedures. E-Recruitment is a stand-alone system that has no interaction with e-HR and will have no interaction with SYSPER either.

The processing of the data refers only to the period of implementation of SYSPER 2 and relates to the management of the administrative data of Eurojust staff, SNEs and their family members, ensuring efficient and effective management of core HR operations. The purpose of processing personal data within the project is to ensure a correct upload of all administrative data of Eurojust staff, SNEs and their family members from e-HR to SYSPER. To do so, data is extracted from e-HR in excel, checked by HR staff to ensure accuracy and completeness, and is then uploaded in COMREF, where a further check is performed against the payroll data in the NAP system of the Commission. Once data correctness is certified by DG HR, data is uploaded to SYSPER.

The purpose of the processing operation via Sysper2 is mainly the following:
- to identify all staff members and SNEs at Eurojust;
- to support some of the procedures of human resource management (recruitment, career management, job descriptions, definition of statutory links and individual rights, salaries, etc.);
- to support the implementation of the staff appraisal and reclassification systems, staff planning functions and HR reporting;

The purpose and content of SYSPER2 basic modules that will be implemented initially at Eurojust can be summarised as follows:

1.Organisation chart (ORG)

This module enables the management of the organisational structure and management functions for Eurojust. Organisational entities at various levels managed with this module "host" all the jobs of the Institution.

2. Job quotas (DOT)

This module enables the management and accounting of the job quotas, e.g. the jobs defined in the budget's establishment plan. The stock of job quotas is distributed to each entity, up to the level of Unit, and assigned to individual jobs. This allows to identify how

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		many establishment plan jobs are used in each organisational entity at any moment, and where the free resources are.

3. Job Information System (JIS)

This is the module for the management of job descriptions: job title, purpose, function, requirements etc.

4. Personal Data Management (PER core)

It allows management of personal data of Eurojust staff and SNEs, address declaration and associated validation workflow.

5. Family composition (FAM)

It allows management of data of Eurojust staff' dependents and family members.

6. Career and Mobility (CAR core)

It covers the basic procedures for daily management of various types of staff, from the entry into service and the probation period, to mobility and interruption of service, until the processes associated to the end of a career.

7. Time Management

This module is the integrated solution for the management of working time and working formulas. It includes:

• the management of absences and leaves;

• work patterns (part-time, parental and family leave);

• the recording of presences, including the management of the monthly settlement within the framework of the flexible working hours (optional TIM module);

• teleworking (optional TIM module);

• the ATS module (standby duty, shift work, arduous working conditions - optional TIM module).

8. Document Management (DOC)

This module allows the generation and management of documents (certificates). Template design of the module is flexible and documents are configurable.

In addition to the basic modules described above, Eurojust will decide on the implementation of additional modules e.g. reporting, appraisal and reclassification. The record will then be updated accordingly. |

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8.	**Description of categories of persons whose data are processed and list of data categories**	Data subjects are Temporary Agents (TA), Contract Agents (CA) & Seconded National Experts (SNE) working at Eurojust. Data categories include personal data such as name, address, contact details, marital status, family composition, salary (or for SNEs Eurojust SNE allowance), job descriptions, date & place of birth, nationality(ies), contact person, type and duration of contract/secondment, work schedules, leaves and absences. SYSPER data related to staff entitlements that lead to a change in pay will be (in the future once the system is live and in full use) sent directly to NAP after the SYSPER verification process of said entitlements is completed. In essence, SYSPER will replace the PMO notifications regarding entitlement modifications that HR currently sends to PMO on a monthly basis. This interaction with NAP will only take place however once the system is in full use and all the verification processes have been configured.
9.	**Time limit for keeping the data**	The retention periods for data in SYSPER are set at the level of DG HR as owner and administrator of the SYSPER system. The retention periods are the same for all agencies and the Commission and Eurojust does not have the possibility to adjust them. The only actions that can be undertaken by the agencies are to create, modify or correct data; agencies cannot delete individual profiles entirely. In general, personal data in Sysper2 is stored until the end of the staff member's activity for Eurojust. Data related to subsisting rights and obligations need to be conserved for a longer period. Those data have a retention period of 8 years after the expiry of all rights of the staff member concerned and of any dependents, and for at least 120 years after the date of birth of the person concerned.
10.	**Recipients of the data**	For the duration of the project, the data collected will only be disclosed to the absolute minimum of persons involved in the respective processes and namely Eurojust staff working in the Human Resources Unit. The Head of HRU, as data controller and responsible for the use of SYSPER, has access to all parts of SYSPER during the pilot project, necessary for ensuring compliance and accuracy in the use of the new system, identifying issues, evaluating the new modules and reporting during the pilot. This access will be reviewed at the end of the pilot to determine whether it needs to be maintained or can be limited.

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		One horizontal profile is assigned in HR to the post-holder appointed as the SYSPER Coordinator, who is also responsible for the application of implementing rules and HR policies. For the performance of these tasks, the SYSPER Coordinator profile allows read-only access to all SYSPER modules, in order to monitor implementation during the pilot and act as the link between Eurojust and DG HR for any (HR or technical) SYSPER issues. No editing rights are granted to this profile and access rights will be reviewed at the end of the pilot. Staff working in HR Admin, responsible for data verification and upload for the duration of the project have access to all personal data.
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.**	The data are stored at the Commission's Computing Center in Luxembourg and are therefore protected by the numerous defense measures implemented by the Directorate-General for Informatics to protect the integrity and confidentiality of the Institution's electronic assets. Access to personal data is protected by the management of access rights which are strictly limited to the principle of "need to know" according to the tasks assigned to access holders. The access rights are linked to the business membership group and the profile determined for each manager. The login and password are managed by the European Commission's Common Authentication Services (EU Login). Accesses, as well as any modifications performed on the data, are logged to ensure traceability of these actions. These logs include who modified the data, when, and what modifications were done, including previous values and new values. The overall responsibility for the implementation of the data protection rules rests with the "controller", i.e. the Head of Human Resources Unit. It is the "controller" who determines who has what right of access to which part of the system.

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13.	**For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:**	[Data Protection notice](#)