

## PRIVACY STATEMENT / RECORD

### FLEXITIME POLICY

#### Organisational part of the Agency entrusted with the processing of personal data

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#### Purpose

The processing of personal data is necessary to ensure a positive life-work balance to staff members through flexible working arrangements.

#### Legal basis

- Council Regulation (EU) 2019/126 of the European Parliament and of the Council of 16 January 2019 establishing the European Agency for Safety and Health at Work (EU-OSHA), and repealing Council Regulation (EC) No 2062/94.
- Staff Regulations of Officials (Article 55) and Conditions of Employment of Other Servants of the European Communities (Article 16).
- EU-OSHA Flexitime Policy.
- Director's decision RSC 2012 (15) – EUHR Allegro N.1 on the implementation of the electronic tool for HR management "EUHR-Allegro".
- Director's decision RSC 2012 (16) – EUHR Allegro N.2 on access rights, delegations and authorizations in "EUHR Allegro" and its Corrigenda.

#### Type of data processed

- Name, last name, personnel number.
- Daily events, such as arrival and departures (incl. duration of lunch break): on the basis of this data, Allegro calculates a balance (positive or negative) compared to the expected amount of hours per month.
- Compensation time (flexileave).

#### Lawfulness of processing

The processing is based on Article 5.1 (a) 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 (hereinafter the Regulation).

## Data recipients

Access to the personal data is granted on the basis of the role and responsibilities of the subjects involved ("need to know" principle):

- Duly appointed staff in the HR Section.
- Heads of Unit and their assistants (delegates in Allegro).
- Allegro service provider (Adequasys).

## The data subject's rights

Data subjects have the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or, where applicable, the right to object to processing or the right to withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal (Articles 17, 18, 19, 20, 22, 23 and 24 of the Regulation).

Any requests to exercise one of those rights should be directed per email to the organisational part of the Agency entrusted with the processing operation as indicated in this privacy statement, including in the subject the words "data protection".

Data subjects' rights can be restricted only in the cases foreseen in Art 25 of the Regulation.

- Right of access: data subjects have access to their flexitime information in their workspace in Allegro.
- Right of rectification: data subject can rectify their flexitime information by amending their timesheet in their Allegro workspace until the 7th of the following month. After that, their request has to be submitted through ASK HR. They can request the cancellation of their requests for flexileave and introduce new ones through the "My absence" module available in the Allegro.
- Right of blocking: data subjects may request the blocking of their data by submitting a request to ASK HR. The HR section will take a snapshot photo of the data (three copies) within 5 working days from a justified request.

## Information on the conservation period of data

Flexitime information data are retained only during the calendar year. These would be deleted once the transfer of unused days of annual leave to the following year has been closed, at the latest by March n+1. This retention period applies to physical files only (processed manually).

In case of prolonged leave, balance of hours is retained until the data subject returns to work to ensure that compensation time is maintained.

## Security measures

Throughout this procedure only authorised people are attributed access rights and only on a "need-to-know" basis.

Any possible security measure is taken to prevent any improper use of or unauthorized access to the electronic file. Procedure-related documents are kept in a secure environment, on an encrypted data carrier, or locked in cupboards/drawers.

### Request for information

For any further information regarding the handling of their personal data, data subjects can address their request to EU-OSHA Data Protection Officer at: [dpo\(at\)osha.europa.eu](mailto:dpo(at)osha.europa.eu).

### Recourse to the EDPS

Data subjects are entitled to make recourse to the European Data Protection Supervisor: <http://www.edps.europa.eu>, should they consider that the processing operations do not comply with the Regulation.

### Date when processing starts

Date of the entry into force of the policy.

*Privacy statement last updated: 5/27/2019 1:47:17 PM*