



RECORD OF PERSONAL DATA PROCESSING ACTIVITY

Based on Article 31 of the Regulation (EU) 2018/1725¹ on the protection of natural persons with regards to the processing of personal data by the Union Institutions, bodies, offices and agencies and on the free movement of such data, each responsible EASME data controller has to maintain a record of the processing activities under his/her responsibility.

Record No: R-2020-01

Initial approval by Data Controller: *see Ares signature*

Previous Notification (if applicable): *n/a*

Update (s) (if applicable): *n/a*

NAME OF THE PROCESSING ACTIVITY

Financial contribution scheme for EASME staff members commuting by bicycle to and from work

IDENTIFICATION OF THE DATA CONTROLLER

Executive Agency for Small and Medium-sized Enterprises (EASME), Head of Unit C.2, EASME HR sector

GROUND FOR THIS RECORD (*select relevant ground*)

- Record of a new type of processing activity of personal data (before its implementation)
- Record of a processing activity of personal data that is already in place (ex-post)
- Change/Amendment/ Update of an already existing previous record (or previous notification to DPO)

DESCRIPTION OF THE PROCESSING ACTIVITY

The aim of this processing activity is to be able to refund staff members who are eligible for the financial contribution scheme for commuting by bicycle to and from work.

¹ [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 (OJ L 295/39 of 21.11.2018).

1. INFORMATION ON THE PROCESSING ACTIVITY

of Financial contribution scheme for EASME staff members commuting by bicycle to and from work

This processing activity is performed in accordance with **Regulation (EU) No 2018/1725**² on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

1.1. The Data Controller is:

The Head of Unit Administration C.2 at the Executive Agency for Small and Medium-sized Enterprises (EASME), Place Charles Rogier 16, B-1049 Brussels and can be contacted at: easme-hr-administration@ec.europa.eu

1.2. The following entity(ies) is/are acting as Processor(s):

n/a

1.3. The legal basis for the processing based on Article 5(1) of Regulation (EU) 2018/1725:

- (a) the 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 body³;
- (a2) the processing is necessary for the **management and functioning** of the Union Institutions or bodies (Recital (22) of Regulation 2018/1725) ;
- (b) the processing is necessary for **compliance with a legal obligation** to which the controller is subject, which are laid down in the Decision of the EASME Director of 22/01/2020⁴ ;
- (c) the processing is necessary for the **performance of a contract** to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- (d) the data subject has given **consent** to the processing of his or her personal data for one or more specific purposes;
- (e) the processing is necessary in order to protect the **vital interests** of the data subject or of another natural person.

1.4. The purpose(s) of this processing is/are to:

Be able to refund staff who are eligible to the financial contribution scheme for staff members commuting by bicycle to and from work.

1.5. The categories of data subjects concerned by this processing are:

All statutory staff members (CA, TA, SNEs).

1.6. The following personal data are collected:

name, surname, perID, personal number, personal address, unpaid leaves periods, parental leaves/ family leaves periods (used for the calculation of the reimbursement), bank account numbers are mandatory for the purpose(s) outline above. The personal address will be retrieved automatically from SYSPER.

The above mentioned personal data are **mandatory** for the purpose(s) outline above.

1.7. The recipients to whom of the personal data will or might be disclosed are:

² [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 (OJ L 295/39 of 21.11.2018).

³ EASME Act of Establishment: Commission Implementing Decision C(2013/771/EU) of 17 December 2013 establishing the 'Executive Agency for Small and Medium-sized Enterprises' and repealing Decisions 2004/20/EC and 2007/372/EC.

⁴ [ARES\(2020\)398604](#).

the competent persons in the EASME HR Sector (People Services Team) and the Finance unit and bodies charged with monitoring or inspection tasks in application of EU law (e.g. internal audits, European Anti-fraud Office – OLAF).

1.8. Personal data **will not be transferred to third countries or international organisations.**

1.9. The processing of this personal data **will not include** automated decision-making (such as profiling).

1.10. **The following technical and organisational security measures** are in place to safeguard the processing of this personal data:

The personal data in SYSPER and the financial information (bank account number) are only accessible through password protected applications (SYSPER, Speedwell and ABAC) to authorised persons and on a need-to-know basis only. The Agency is subject to rules of the European Commission on the security of information systems.

1.11. The personal data concerned **will be kept for a maximum period** of 60 months from the date of eligibility to the scheme – data from non-eligible staff data will be deleted. Data will be deleted at the end of this period.

1.12. Data Subjects are informed on the processing of their personal data via a **data protection notice on their rights** :

- to access their personal data held by a controller;
- to request their personal data held by a controller to be corrected;
- to obtain in some situations erasure of their personal data held by a controller, e.g. when data are held unlawfully (right to be forgotten);
- to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- **of recourse** at any time to the **EASME Data Protection Officer** at EASME-DPO@ec.europa.eu and to the **European Data Protection Supervisor** at <https://edps.europa.eu>.

Request from a data subject to exercise a right will be dealt within **one month**.

Any queries concerning the processing of personal data, have to be addressed to the Data Controller indicated above in 1.1. at easme-hr-administration@ec.europa.eu.
