



European Ombudsman

Secretary General

Personnel, Administration and Budget Unit

European Ombudsman

Public record of processing activity¹:

General data processing in SYSPER

1. Last update of this record: 17.08.20

2. Reference number²: 14/2020

3. Name and contact details of the controller³: European Ombudsman, 1 avenue du Président Robert Schuman, CS 30403, F-67001 Strasbourg Cedex - EO@ombudsman.europa.eu

Responsible department: HR Sector- Personnel, Administration and Budget (PAB) Unit

4. Name and contact details of the Data Protection Officer: Mr Juliano Franco, Dpo-Euro-Ombudsman@ombudsman.europa.eu

5. Name and contact details of the processor⁴: N/A

6. Name and contact details of the joint controller(s)⁵: European Commission, as the system owner of SYSPER, used to process HR data of staff members from the EO Office.

7. Purpose(s) of the processing⁶: SYSPER is an integrated information system for the management of HR in the EO Office. It contains personal data of individuals, to different extent for different groups, following a need-to-know principle to ensure

¹ To be filled in by the controller. See Article 31(1) and (5) on records of processing activities of Regulation 2018/1725: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

² For tracking. If the office decides to keep a central register, contact the keeper of that register to obtain a reference number.

³ Use functional mailboxes as far as possible to ensure business continuity.

⁴ Where applicable. If you use a processor (contractor) to process personal data on your behalf, please indicate so (e.g. 360° evaluations, outsourced IT services or pre-employment medical checks).

⁵ Where applicable. If you are jointly responsible with another EU institution, please indicate so here (e.g. two institutions with shared medical service). If this is the case, make sure to mention in the description who is in charge of what and who people can address for their queries.

⁶ Very concise description of what you intend to achieve; if you do this on a specific legal basis, mention it as well (e.g. staff regulations for selection procedures).



a proper business operation of the Institution. Specific processing operations (e.g. for time management, career) are covered by specific records.

HR Sector collects and uses personal information of staff members from the EO Office to support and facilitate the management of staff and workforce (ex: recruitments, career, appraisal, promotion) in SYSPER.

This record covers general processing in SYSPER, i.e.:

- Using personal identification number (“perid”) to match a person with other identification data like name, surname, gender, data of birth etc.
- Assigning roles, access rights, and actors;
- Logging of persons to the system;
- Simulating users in order to testing bugs resolution or properly test any new development;
- Usability tests and user research;
- Assigning persons to jobs within organizational entities and their activities in relation to the Commission priorities.

The legal basis are the Staff Regulations and the Conditions of Employment of other servants of the European Communities (CEOS).

8. Description of the categories of data subjects and of the categories of personal data⁷:

- Categories of data subjects: staff members from the EO Office (officials, temporary or contract agents), seconded national experts, trainees, and persons related to them (family members)

- Categories of personal data: HR sector may collect and use the data available in SYSPER (ex.: personal, organisational, career, family composition) that concern EO staff and persons related to them. This data includes:

- perid;
- job number;
- organisational entity
- logs of persons to SYSPER.

9. Time limit for keeping the data and, where possible, for erasure⁸:

Perid is kept during the whole active career, its breaks and also in post-activity. Information on roles, access rights, organisational entity is kept for each assignment during the active career. Logs are kept for 10 years. They are deleted afterwards.

⁷ In case data categories differ between different categories of persons, please explain as well (e.g.: suspects vs. witnesses in administrative inquiries)

⁸ Indicate your administrative retention period including its starting point; differentiate between categories of persons or data where needed (e.g. in selection procedures: candidates who made it onto the reserve list vs. those who did not).



10. Recipients of the data⁹:

The EO, the Secretary General, the Head of PAB Unit, the Head of HR sector, the staff member(s) dealing with SYSPER in HR sector.

11. Are there any transfers of personal data to third countries and/or to International Organisations?¹⁰: N/A

12. General description of security measures¹¹: Data is kept according to the security measures developed by DG DIGIT, which own the EC tool SYSPER. All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the EC servers. All processing operations are carried out pursuant to [the Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

SYSPER is only accessible to the EO staff involved in HR management of data concerning recruitments, career, appraisal, promotion in SYSPER, using a user ID and password.

13. Information on how data subjects can exercise their rights of access and rectification, and where applicable, of erasure, restriction and data portability¹²:

They have the right of access to their own personal data and to relevant information concerning how the EO uses it. They have also a right to request rectification of any incomplete or inaccurate data concerning them. They have a right to object to the use of their data by the EO on grounds relating to their particular situation, at any time. Under certain conditions, they have the right to ask that the EO deletes their personal data or restrict its use.

At any time, they may ask the EO information concerning the processing of their personal data by e-mail (EO@ombudsman.europa.eu) or by contacting PAB Unit - HR sector. The EO will reply to their requests as soon as possible and within one month at the latest. They may also contact our Data Protection Officer at: dpo-eo-ombudsman@ombudsman.europa.eu.

If they wish to complain about the Ombudsman's handling of their personal data, they may contact the European Data Protection Supervisor (www.edps.europa.eu) at the following address: EDPS@edps.europa.eu

⁹ Who will have access to the data within the European Ombudsman? Anyone outside the office? No need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EDPS, Court of Auditors).

¹⁰ If yes, include the identification of the country or International Organisation and the documentation of suitable safeguards (e.g. processor in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty).

¹¹ Where possible. Include a general description of your security measures that you could also provide to the public. See Article 33 on security of processing of Regulation 2018/1725: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

¹² Consider publishing the relevant part of the privacy statement and providing a link. See Articles 15 and 16 on the information to be provided to the data subject(s) and Article 17 to 22 on the rights of data subjects of Regulation 2018/1725: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>



Privacy Statement

relating to the general data processing in SYSPER

This privacy statement explains the reason for the processing, the way the European Ombudsman (EO) collects, handles and ensures protection of all personal data provided, how that information is used and what rights the data subjects may exercise in relation to their data.

The controller is the EO. Joint controller is the European Commission (EC) which owns the IT tool SYSPER, used by the EO office for the processing of HR general data.

1. What personal data will the European Ombudsman process?

The EO may collect and use the data available in SYSPER (ex.: personal, organisational, career, family composition) that concern staff members from the EO Office (officials, temporary or contract agents), seconded national experts, trainees, and persons related to them. This data includes: personal identification number (“perid”) to match a person with other identification data like name, surname, gender, data of birth; job number; organizational entity, logs of persons to SYSPER.

2. Why does the EO process this personal data?

The purpose is to collect and use personal information of staff members from the EO Office to support and facilitate the management of staff and workforce (ex: recruitments, career, appraisal, promotion) in SYSPER.

3. What are the legal basis and necessity for processing this data?

Processing is necessary on the basis of Article 5(1)(a) (the performance of a task carried out in the public interest) and (b) (compliance with a legal obligation to which the controller is subject) of Regulation 2018/1725. Further processing, for example for statistical purposes, may also be made pursuant to articles 4 and 6 of the Regulation 2018/1725.

The legal basis are the Staff Regulations and the Conditions of Employment of Other Servants (CEOS) for example, Articles 43, 44 paragraph 1 of the Staff Regulations and Articles 15.2 and 87.1 of the CEOS for appraisal.

4. Who is responsible for processing the data?

Data is processed by the Unit Personnel, Administration and Budget (PAB) Sector Human Resources (HR).



5. Who will be recipients of the data?

The EO, the Secretary General, the Head of PAB Unit, the Head of HR sector, the staff member(s) dealing with SYSPER in HR sector.

6. How long will the data be kept?

The period is kept during the whole active career, its breaks and also in post-activity. Information on roles, access rights, and organisational entity is kept for each assignment during the active career. Logs are kept for 10 years. Data is deleted afterwards.

7. How do we protect your data?

Data is kept according to the security measures developed by DG DIGIT, which owns the EC tool SYSPER. All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the EC servers. All processing operations are carried out pursuant to *“the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission”*.

SYSPER is only accessible to the EO staff involved in HR management of data concerning recruitments, career, appraisal, promotion in SYSPER, using a user ID and password.

8. What are your rights and how can you exercise them?

You have the right of access to your own personal data and to relevant information concerning how the EO uses it.

You have also a right to request rectification of any incomplete or inaccurate data concerning you. You can rectify identification data at any time. You have a right to object to the use of your data by the EO on grounds relating to your particular situation, at any time. Under certain conditions, you have the right to ask that the EO deletes your personal data or restrict its use.

The EO will reply to your requests as soon as possible and within one month at the latest.

9. Who to contact in case of queries or complaints concerning data protection issues?

At any time, you may send data protection related questions concerning the general data processing in SYSPER to the European Ombudsman, at the following address:

European Ombudsman
1 avenue du Président Robert Schuman



CS 30403
F-67001 Strasbourg Cedex
EO@ombudsman.europa.eu

You also may contact the Data Protection Officer of the EO office at the following address: DPO-Euro-Ombudsman@ombudsman.europa.eu

You may lodge a complaint with the European Data Protection Supervisor at any time at the following address: EDPS@edps.europa.eu