



**Secretary General**

Personnel, Administration and Budget Unit

**Public record of processing activity<sup>1</sup>:**

**Payslips management in the EO Office**

**1. Last update of this record:** 05/11/2020

**2. Reference number<sup>2</sup>:** 21/2020

**3. Name and contact details of the controller<sup>3</sup>:** European Ombudsman (EO), 1 avenue du Président Robert Schuman, CS 30403, 67001 Strasbourg Cedex

Responsible department: Personnel, Administration and Budget (PAB) Unit-Finances sector- e-mail: [EOinvoice@ombudsman.europa.eu](mailto:EOinvoice@ombudsman.europa.eu)

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

**5. Name and contact details of the processor<sup>4</sup>:** European Commission -PMO services are responsible for the calculation of the salaries of EO staff members by means of the New Pay Application "NAP"

Contact email: [PMO-DATA-PROTECTION@ec.europa.eu](mailto:PMO-DATA-PROTECTION@ec.europa.eu)

**6. Name and contact details of the joint controller(s)<sup>5</sup>:**

**7. Purpose(s) of the processing<sup>6</sup>:** The purpose is the calculation and payment of the salaries to the EO staff members

Short description of the processing:

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<sup>1</sup> 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>

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

<sup>3</sup> Use functional mailboxes as far as possible to ensure business continuity.

<sup>4</sup> 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).

<sup>5</sup> 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.

<sup>6</sup> 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).



The calculation of the remuneration and equivalent payments (retirement pension, invalidity allowance, unemployment allowance and other benefits and allowances) is done by PMO in the NAP system. The payments are made based on information related to the professional (ex: status, grade and step) and personal situation (ex: family benefits) of the person concerned processed in SYSPER by PAB Unit-HR sector. This information is then transcoded from SYSPER into NAP, which calculates the remuneration and equivalent financial benefits.

The identification of the staff member or former staff member in NAP is done via the "NUP". This NUP is linked to the data encoded for the staff member by PAB Unit/HR sector or staff member in SYSPER. The link between the NUP and the data in SYSPER is the basis for the transcoding of the financial benefits as encoded in SYSPER into the NAP. The result of the calculation done via the NAP is reflected in the payslips.

#### **8. Description of the categories of data subjects and of the categories of personal data<sup>7</sup>:**

- Categories of data subjects: staff members of the EO and former staff members (pensioners) to whom a payment is being made from the EO budget, whether officials, temporary or contract agents ("staff members")

- Categories of data: all the data is processed in NAP

- name, surname and date of birth, NUP and personal number
- professional address and for former staff members, complete private address<sup>8</sup>
- date of first entry into service<sup>9</sup>
- identification of current employer
- professional situation (status, grade and step)
- bank account

#### **9. Time limit for keeping the data and, where possible, for erasure<sup>10</sup>:**

Payslips and data concerning remuneration and equivalent payments are kept in the NAP 8 years after the extinction of all rights of the person concerned and of his/her dependants but until at least 120 years after his/her date of birth.

Documents linked to attachment of remuneration and equivalent payments are kept in the NAP 7 years. They are deleted afterwards (see [EC privacy statement on pay and financial benefits](#)).

#### **10. Recipients of the data<sup>11</sup>:** The recipients are the EO, the Secretary General as authorising officers, the Head of PAB Unit, the Head of Finance sector, the staff

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

<sup>8</sup> For former staff members, salary slips are to a large degree still being sent by regular mail;

<sup>9</sup> This indicates whether rules pre- or post-reform 2004 or 2014 of the SR are applicable.

<sup>10</sup> 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).

<sup>11</sup> 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).



members from Finances sector responsible for the payslips management under the NAP and the PMO services in charge of the calculation of remuneration and equivalent payments.

**11. Are there any transfers of personal data to third countries and/or to International Organisations?<sup>12</sup>: No**

**12. General description of security measures<sup>13</sup>:** Only the staff member concerned, the Head of PAB Unit, the Head of Finances sector and the staff members from Finances sector responsible for the payslips management under the NAP have access to the payslips. The data is kept according to the security measures developed by the EC that owns the IT application NAP.

**13. Information on how data subjects can exercise their rights of access and rectification, and where applicable, of erasure, restriction and data portability<sup>14</sup>:**

Staff members and former staff members have access to the data used for their personal identification and their professional situation via the payslip they receive. They can also ask to have access to relevant information concerning how the EO uses it. They can also 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 ([EOinvoice@ombudsman.europa.eu](mailto:EOinvoice@ombudsman.europa.eu)) or by contacting PAB Unit - Finances sector. The EO will reply to their requests as soon as possible and within one month at the latest. They may also contact the EO Data Protection Officer at: [dpo-eo-ombudsman@ombudsman.europa.eu](mailto: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](http://www.edps.europa.eu)) at the following address: [EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)

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<sup>12</sup> 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).

<sup>13</sup> 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>

<sup>14</sup> 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 payslips management in the European Ombudsman's Office

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. The processor is the European Commission (EC) - PMO services responsible for the calculation of the salaries of EO staff members by means of the New Pay Application ("NAP").

### 1. What personal data will the EO process?

We process the following personal data of staff members of the EO and former staff members (pensioners) to whom a payment is being made from the EO budget, whether officials, temporary or contract agents ("staff members"):

- name, surname and date of birth, NUP<sup>15</sup> and personal number;
- professional address and for former staff members, complete private address<sup>16</sup>;
- date of first entry into service<sup>17</sup>;
- identification of current employer;
- professional situation (status, grade and step);
- bank account

### 2. Why does the EO process this personal data?

The purpose of this process is the calculation and payment of the salaries to the EO staff members.

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

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<sup>15</sup> The identification of the staff member or former staff member in the NAP is done via the "NUP".

<sup>16</sup> For former staff members, salary slips are to a large degree still being sent by regular mail.

<sup>17</sup> This indicates whether rules pre- or post-reform 2004 or 2014 of the Staff Regulations are applicable.



The processing of the data is based on the Financial Regulation<sup>18</sup> and its implementing rules and on the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Union<sup>19</sup>.

Processing is necessary for the performance of a task carried out in the public interest (Article 5(1)(a) of Regulation 2018/1725) and for compliance with a legal obligation to which the controller is subject (article 5(1) (b) of Regulation 2018/1725).

#### 4. Who is responsible for processing the data?

Data is processed by the Unit Personnel, Administration and Budget (PAB) - Finances sector.

#### 5. Who will be recipients of the data?

The recipients are the EO, the Secretary General as authorising officers, the Head of PAB Unit, the Head of Finances sector, the staff members from Finances sector responsible for the payslips management under the NAP and the PMO services in charge of the calculation of remuneration and equivalent payments.

#### 6. How long will the data be kept?

Payslips and data concerning remuneration and equivalent payments are kept in the NAP 8 years after the extinction of all rights of the person concerned and of his/her dependants but until at least 120 years after his/her date of birth. Documents linked to attachment of remuneration and equivalent payments are kept in the NAP 7 years. Once the legal deadline has expired, the files are deleted.

#### 7. How do we protect your data?

Only the staff member concerned, the Head of PAB Unit, the Head of Finances sector and the staff members from Finances sector responsible for the payslips management under the NAP have access to the payslips. The data is kept according to the security measures developed by the EC that owns the IT application NAP.

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<sup>18</sup> Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union.

<sup>19</sup> Regulation No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community.



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

You have access to the data used for your personal identification and professional situation via the payslip you receive. You can also ask to have access 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 management of payslips in the EO Office, at the following address:

European Ombudsman  
1 avenue du Président Robert Schuman  
CS 30403  
F-67001 Strasbourg Cedex  
[EOinvoice@ombudsman.europa.eu](mailto:EOinvoice@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](mailto: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](mailto:EDPS@edps.europa.eu)