



European Ombudsman

Secretary General

Directorate for Administration

European Ombudsman

Public record of processing activity:

Monitoring of the European Ombudsman Office's establishment plan ("Ring book management")

- 1. Last update of this record:** 11.08.2021
- 2. Reference number:** 11/2021
- 3. Name and contact details of the controller:** European Ombudsman, 1 avenue du Président Robert Schuman, CS 30403, F-67001 Strasbourg Cedex - EO@ombudsman.europa.eu
Responsible department: Directorate for Administration - HR team
- 4. Name and contact details of the Data Protection Officer:** Ms Francesca PAVESI- Deputy DPO: Mr Nicholas Hernanz- Dpo-Euro-Ombudsman@ombudsman.europa.eu
- 5. Name and contact details of the processor:** N/A
- 6. Name and contact details of the joint controller(s):** N/A
- 7. Purpose(s) of the processing:** To keep accurate information about the office's establishment plan and monitor its evolution over time (including information on vacant posts and their type, recruitments etc.).

The legal basis of the procedure is the [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 \("Financial Regulation"\) and its implementing rules](#).



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

- Categories of data subjects: All staff of the European Ombudsman (EO), excluding trainees and contract agents.

- Categories of personal data:

- type of post (statutory link - permanent or temporary)
- entity to which staff members are assigned
- categories of posts (AD/AST/AST.SC)
- grade of post(1-16)
- workplace (STR/BRU)
- post number¹
- job number (SYSPER)
- year of post's creation
- name and surname of staff member occupying each post
- category of staff member
- grade of staff member
- step of staff member(1-5)
- seniority in grade (date)
- seniority in step (date)
- duration in step (in months)
- part time availability of the post (% time)
- staff member's eligibility for promotion (date)
- occupation of the post (1/0)

When necessary for ensuring the accurate monitoring of the establishment plan, the current month's ring book contains information on the end date of definite duration contract next to the name of the staff member concerned or other information about the post (for example, the name of the person who will occupy a post when the person has been selected but the recruitment procedure is not yet finalised).

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

1) The EO keeps the personal data listed in point 8 above in the ring books of the current year (monthly versions as of 2021);

2) the EO keeps the same personal data (in point 8 above), with the exception of information on staff eligible for promotion, in the ring books of the previous 7 years in PDF version;

3) the EO deletes all personal data from ring books older than 7 years, and keeps one ring book version in PDF (usually the December one) per year containing the following data: type of post (permanent or temporary), post number, post category (AD, AST, AST/SC), and post grade, for statistical purposes.

¹ Post number in the former database the EO used for HR management.



All ring book versions (current and past ones) are kept in the office's server in a secured drive accessible to staff members on a need-to-know basis.

10. Recipients of the data: The Ombudsman , the Secretary General, the Director for Administration, the Head of HR, the Head of Budget and Finance (also accounting officer) for budget purposes (e.g establishment plan modifications), the staff member(s) in the HR team monitoring the ring book, the ex-ante verification officer when a new staff member is recruited.

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

12. General description of security measures:

The ring book versions are archived electronically in the office's server in a secured drive accessible to the Ombudsman, the Secretary General, the Director for Administration, the Head of HR, and the staff member(s) in the HR team monitoring the ring book. No other staff members have access to this secured drive.

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

Staff members can ask to have access to their own personal data and to relevant information concerning how the EO uses it. They can also request rectification of any incomplete or inaccurate data concerning them. Under certain conditions, 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, as well as a right to ask that the EO delete their personal data or restrict its use. It is important to note that the rights listed above are not absolute rights: Regulation (EU) 2018/1725 lays down specific grounds and conditions for data subjects when they make use of those rights. It is likely that the EO will continue processing personal data as part of the ring book management even if it receives requests concerning objection, deletion or restriction.

At any time, staff members may ask the office information concerning the processing of their personal data by e-mail (EO@ombudsman.europa.eu) or by contacting the Directorate for Administration (HR team). The services will reply to their requests as soon as possible and within one month at the latest. They may also contact the office's Data Protection Officer at: dpo-eo-ombudsman@ombudsman.europa.eu.

If they wish to complain about the EO'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



Privacy Statement

relating to the ring book 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.

1. What personal data will the European Ombudsman process?

We process the following personal data of all staff at the EO Office, ("staff members"), excepted trainees and contract agents: type of post (statutory link - permanent or temporary); entity to which staff members are assigned; categories of posts (AD/AST/AST.SC); grade of post(1-16); workplace (STR/BRU); post number; job number (SYSPER); year of post's creation; name and surname of staff member occupying each post; category of staff member; grade of staff member; step of staff member(1-5); seniority in grade (date); seniority in step (date); duration in step (in months); part time availability of the post (% time); staff member's eligibility for promotion (date); occupation of the post (1/0).

When necessary for ensuring the accurate monitoring of the establishment plan, the current month's ring book contains information on the end date of definite duration contract next to the name of the staff member concerned or other information about the post as for example the name of the person who will occupy a post when the person has been selected but the recruitment procedure is not yet finalised.

2. Why does the European Ombudsman process these personal data?

The purpose is to hold accurate information about the EO office's establishment plan and its evolution over time (including information on vacant posts, recruitments, etc.).

3. What are the legal bases 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 5(1) (b) (compliance with a legal obligation to which the controller is subject) of Regulation 2018/1725.

The legal basis is Article 52 of 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 ("Financial Regulation") and its implementing rules.

4. Who is responsible for processing the data?

Data is processed by the Directorate for Administration- Human Resources (HR) team.

5. Who will be recipients of the data?

The recipients are the EO, the Secretary General, the Director for Administration, the Head of HR, the staff member(s) dealing with the ring book in the HR team, the ex-ante verification officer when a new staff member is recruited and the accounting officer involved for budget purposes in the establishment plan modifications.

6. How long will the data be kept?

The EO keeps the personal data listed in point 1 above in the ring books of the current year (monthly versions as of 2021) for regular management.

He/she keeps the same personal data (in point 1 above), with the exception of information on staff eligible for promotion, in the ring books of the previous 7 years in PDF version, for audit purposes.

The EO deletes all personal data from ring books older than 7 years, and keeps one ring book version in PDF (usually the December one) per year, containing the following data: type of post (permanent or temporary), post number, post category (AD, AST, AST/SC), and post grade, for statistical purposes.

7. How do we protect your data?

The ring book versions are archived electronically in the office's server in a secured drive accessible to the Ombudsman, the Secretary General, the Director for Administration, the Head of HR team, and the staff member(s) in the HR team monitoring the ring book. No other staff members have access to this secured drive.

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.

Under certain conditions, 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 the 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 ring book management to the EO, 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