

TIME RECORDING

Key information

Controller

Cesare Onestini, Director of the ETF, Cesare.Onestini@etf.europa.eu

Process owner

Manuela Prina, Head of Strategic Development Department ad interim, Manuela.Prina@etf.europa.eu

Data protection officer

DataProtectionOfficer@etf.europa.eu

Purpose of the processing

Staff records time worked against the activities defined in the annual work programme and department plans, in line with the Activity Based Management principles in place at the ETF. Time recording allows for the monitoring and costing of the human resources spent on ETF activities, versus the original planning assumptions.

Legal basis (if applicable)

The legal basis for the processing operations of personal data is:

- *Regulation (Ec) No 1339/2008 of the European Parliament and of the Council of 16 December 2008 establishing a European Training Foundation (recast), Article 13 Annual activity report, comma 2*
- *ETF Financial Regulation 2013 (GB/13/DEC/014 of 16/12/2013), Article 29 Principles of economy, efficiency and effectiveness/ Principle of sound financial Management, and Article 47 Consolidated Annual Activity Report*
- *ETF Performance Management and annexed ETF Performance Planning, Measurement and Reporting Policy (ETF/17/DEC/005 of 26-04-2017)*

Personal data

Personal data concerned are:

- *Name, surname and amount of time recorded by staff member on a given day on a given ETF activity*
- *The data is input by the staff members, ENDs. This can occur fully manually, or in a semi-automated way. In the latter case, the system being populated automatically based on the clock-in and clock-out entries of the staff presence system used for determination of flexi-time credits and debits, with default assignment to pre-configured time recording categories, to have a base-line recording with the possibility of modifying the entries where needed.*

- *Provision of data is obligatory*

Recipients of the personal data

For the purpose detailed above, access to personal data is provided to the following processing entities:

- *Line managers: Aggregated (monthly) data of the individual staff members under their responsibility (through reporting module of the Time recording system)*
- *SDD Corporate performance officer: Detailed data of individual staff (directly in time recording system)*
- *ICT software technicians: Detailed data of individual staff (directly in time recording system)*
- *All staff: Aggregated totals of data (for the respective budgetary year) per activity, through the ABM system (ETF Dashboard)*
- *ETF Governing Board members have access to aggregated totals of data (for the respective budgetary year) per activity, through the ABM system (ETF Dashboard)*

Further information

Data retention

Individual staff data is kept in the time recording system for 5 years, and visualised in the ABM system (ETF Dashboard) in aggregated form for the same 5 years.

Aggregated data (at ETF and department level) is reported in ETF quarterly and annual reports for historical archiving.

Right of access, rectification or erasure, restriction, objection

Any request to access, rectify or erase personal data, or to restrict or object to the processing of personal data shall be addressed in writing to the Head of Strategic Development Department, Manuela.Prina@etf.europa.eu, giving details of the request.

Right to lodge complaint

Data subjects can at any time lodge a complaint on the processing of their personal data to the ETF Data Protection Officer ([DataProtectionOfficer@etf.europa.eu](mailto>DataProtectionOfficer@etf.europa.eu)) or to the European Data Protection Supervisor (<http://www.edps.europa.eu>).