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I.   RECORD OF PERSONAL DATA PROCESSING OPERATION (Article 31 of Regulation (EU) No. 2018/1725)

1.	Name of the processing operation	**Allegro HR management system**
2.	Reference number/Issue	ETF-DPR-32/Issue 3
3.	Date	27/10/2020
4.	Business owner	Nadège Perrine Head of HR Unit Nadège.Perrine@etf.europa.eu
5.	Controller	Cesare Onestini Director of the ETF Cesare.Onestini@etf.europa.eu
6.	Joint controller(s)	Not applicable
7.	Processor(s)	Contractor providing the Allegro system and its customisation
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu

9.	Purpose of the processing	Allow the sound management of ETF staff data related to contract, administrative career, determination of rights, working conditions, leave and absences, working time, learning & development and performance management. Further processing: working time data is used to create an inventory of staff on ETF premises in case of emergency situations (see more details in record Staff access and presence management).
10.	Legal basis for the processing	• For data related to contract, administrative career and determination of rights: Art. 26 of Staff Regulations • For data related to working conditions: ETF Governing Board Decision ref. GB/16/DEC/002 on part time, European Commission Decision ref. EC (C(2010)7572) on parental leave, European Commission Decision ref. EC (C(2010)7494) on family leave, ETF Governing Board Decision ref. GB/15/DEC/018 on unpaid leave • For data related to leave and absences: ETF Governing Board Decision ref. GB/14/DEC/001 on leave, ETF Governing Board Decision ref. GB/06/DEC/002 on absences as a result of sickness or accident, ETF Governing Board Decision ref. GB/18/DEC/001 on teleworking, Director's Decision ref. ETF/17/DEC/004 on compensatory leave for exceptional work during ETF public holidays • For data related to working time: ETF Governing Board Decision ref. GB/14/DEC/002 on Working Time applicable by analogy to ETF - C(2014) 2502 • For data related to learning & development, please refer to the relevant record • For data related to performance management, please refer to the relevant record
11.	Categories of data subjects	All ETF Statutory staff, Trainees and SNEs
12.	Categories of personal data	• Staff member: name, contact details, nationality, date of birth, gender, place of residence, marital status, financial allowances paid by another source, salary slips and supporting documents linked to

		sick leave and special leave • Spouse/recognised partner: name, nationality, age, gender, residence, income, administrative status vis-à-vis employer, details of the employer • Dependent child/person/relative: name, nationality, age and gender
13.	Time limits for keeping of data	• 30 years after termination of service for data related to contract, administrative career, determination of rights, working conditions and salary slips • 3 years for data related to leave and absences (incuding supporting documents linked to sick leave and special leave) and working time • Until termination of service for data related to learning & development and performance management

14.	Categories of ETF recipients of data	HR Unit, managers (only for data subjects for whom the managers hold a direct line management relationship) and the software development officer (only for technical issues related to the functioning of the Allegro software)
15.	Categories of external recipients of data	Contractor's staff providing support for the functioning of the Allegro system
16.	Transfers of data to third country or international organisation	Not applicable

17.	Technical and organisational security measures	The access to the Allegro software is limited to authorised actors with specific access roles via user authentication (ID and password)
18.	Information to the data subject	Provided in privacy statement

II.   COMPLIANCE CHECK AND RISK SCREENING OF PERSONAL DATA PROCESSING OPERATION (Article 26 and 39 of Regulation (EU) No. 2018/1725)

Name of the processing operation	**Allegro HR management system**
Reference number	ETF-DPR-32/Issue 3
Date	27/10/2020

A.   Compliance check

19.	**Lawfulness** (Legal basis and necessity for processing, point 10) ☐ Necessary for performance of tasks in the public interest attributed by EU or MS legislation ☒ Necessary for the management and functioning of the organisation ☒ Necessary for compliance with legal obligation incumbent on controller ☐ Necessary for performance of a contract to which the data subject is party ☐ The data subject has given consent ☐ Necessary in order to protect the vital interests of the data subject or of another natural person	
20.	**Purpose definition** (Point 9) • Do you list all purposes? • Are the purposes specified, explicit, legitimate? • Where information is also processed for other purposes, are you sure that these are not incompatible with the initial purpose(s)?	• Yes • Yes • Yes
21.	**Data minimisation** (Point 12) • Do you really need all data items you plan to collect? • Are there any you could do without?	• Yes • No
22.	**Accuracy** (Point 12) • How do you ensure that the information you process about people is accurate? • How do you rectify inaccurate information?	• HR rely on information provided by staff and, in case of doubts, probe the staff and ask for further supporting documents. Staff have full access to their own data and can signal any inaccuracies. • As the presence of inaccurate information is signalled, a check is put in place and as applicable relevant rectification is made.
23.	**Storage limitation** (Point 13) • Explain why you chose the storage period(s) mentioned • Are they limited according to the maximum or	• The different storage periods have been established based on ETF/Commission retention scheme and EDPS guidance • As short as possible

	minimum "as long as necessary, as short as possible"? • In case you only need some information for longer, can you split storage periods?	• Yes (see details in point 13)
24.	**Transparency** (Point 18) • How do you tell people about your processing? • If you do not want to inform people (or only inform them after the fact), consult your DPO	• Information is given to the data subject via a privacy statement in the system, which is displayed at first logon, and also displayed under "My identity" menu • Not applicable
25.	**Data subjects rights** (Point 18) • Can people contact you if they want to know what you have about them, want to correct or delete the data, have it blocked or oppose to the processing? • Could there be situations where you would want to refuse e.g. granting access? In case so please describe them	• The data subject can access his/her data at any time. Requests of rectification or deletion of data will be checked and accepted only if compliant with the regulatory framework. • Not applicable

B.   Risk screening

26.	**Does the processing involve any of the following?**		
	• Data relating to health, (suspected) criminal offences or otherwise considered sensitive	☒ Yes	☐ No
	• Evaluation, automated decision- making or profiling	☐ Yes	☒ No
	• Monitoring data subjects	☐ Yes	☒ No
	• New technologies that may be considered intrusive	☐ Yes	☒ No
	• Exclusion databases	☐ Yes	☒ No
	• Large-scale processing of special categories of personal data (disease surveillance, pharmacovigilance, central databases for law-enforcement cooperation)	☐ Yes	☒ No
	• Internet traffic analysis breaking encryption	☐ Yes	☒ No
	• Management of personal files	☒ Yes	☐ No
	• Staff evaluation procedures	☒ Yes	☐ No
	• Staff selection procedures	☐ Yes	☒ No
	• Establishment of rights upon entry into service	☒ Yes	☐ No
	• Access control systems	☐ Yes	☒ No
	• Video surveillance	☐ Yes	☒ No

C.   Conclusions

	Actor	Date	Signature
27.	**Business owner** Nadège Perrine Head of HR Unit **Conclusion** Threshold assessment required according to Risk screening	**27-10-2020**	
	Data Protection Officer: Laurens Rijken **Conclusion** I confirm that a threshold assessment is required	**29-10-2020**	**Email validation**

III. THRESHOLD ASSESSMENT OF PERSONAL DATA PROCESSING OPERATION (Article 26 and 39 of Regulation (EU) No. 2018/1725)

Name of the processing operation	**Allegro HR management system**
Reference number	ETF-DPR-32/Issue 3
Date	27/10/2020

A. Criteria for high risks identification

28.	Systematic and extensive **evaluation** of personal aspects or scoring, including profiling and predicting	☐ Yes	☒ No
29.	Automated-**decision making** with legal or similar significant effect: processing that aims at taking decisions on data subjects	☐ Yes	☒ No
30.	Systematic **monitoring**: processing used to observe, monitor or control data subjects, especially in publicly accessible spaces. This may cover video-surveillance but also other monitoring, e.g. of staff internet use.	☐ Yes	☒ No
31.	**Sensitive data**: data revealing ethnic or racial origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data for identification purposes, data concerning health or sex life or sexual orientation, criminal convictions or offences and related security measures or otherwise considered sensitive.	☒ Yes	☐ No
	Health data are limited to the registration of health-related absences and upload of medical certificates, however without health details (diagnosis). Sexual orientation may be determined from spouse/recognised partner information. This level of information does not expose the system to high risks.		
32.	Data processed on a **large scale**, whether based on number of people concerned and/or amount of data processed about each of them and/or permanence and/or geographical coverage	☐ Yes	☒ No
33.	Datasets **matched or combined** from different data processing operations performed for different purposes and/or by different data controllers in a way that would exceed the reasonable expectations of the data subject.	☐ Yes	☒ No
34.	Data concerning **vulnerable data subjects**: situations where an imbalance in the relationship between the position of the data subject and the controller can be identified.	☒ Yes	☐ No
	The system contains minimal information on dependent children necessary for the right to child-related allowances and indication of sickness of child-related absences. This level of information does not expose the system to high risks.		
35.	**Innovative** use or applying technological or organisational solutions that can	☐ Yes	☒ No

	involve novel forms of data collection and usage. Indeed, the personal and social consequences of the deployment of a new technology may be unknown		
36.	**Preventing** data subjects from **exercising a right** or using a service or a contract.	☐ Yes ☒ No	

B.   Conclusion

	Actor	Date	Signature
37.	**Business owner** Nadège Perrine Head of HR Unit **Conclusion** No further action required despite the matching criteria for high risk identification. See justification below Notwithstanding the use of Allegro for staff performance appraisal, the sensitiveness of some information provided and the processing of data of children, this processing of personal data is in line with ETF and Commission rules and procedures. Furthermore, the security measures of the system guarantee confidentiality and limit access to the personal data only to people in charge.	**27-10-2020**	
	Data Protection Officer: Laurens Rijken **Conclusion** I confirm that no further action is required	**29-10-2020**	**Email validation**
	Data Controller Cesare Onestini, Director of the ETF	**29-10-2020**	**email validation**