



EMA/438287/2019

Record of data processing activity relating to working time records (public)

1.	Last update of this record, version number:	31 December 2019, version 1
2.	Reference number:	A8
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of Administration and Corporate Management Division datacontroller.administration@ema.europa.eu
4.	Name and contact details of DPO:	dataprotection@ema.europa.eu
5.	Name and contact details of joint controller (where applicable)	Not applicable
6.	Name and contact details of processor (where applicable)	Not applicable
7.	Purpose of the processing	Processing of personal data relating to working time records is necessary and relevant for the following purposes: <ul style="list-style-type: none">• Staff Members have a degree of choice in deciding their start and end within the rules on working hours, however they are being asked to self-declare the working hours into a database.• Tracking of working hours is also required for Health and Safety reasons.• In addition, recording working time is being used at the Agency since 1996 for activity-based budgeting.
8.	Description of categories of persons whose data EMA processes and list of data categories	The following categories of data subjects are subject to this processing operation: <ul style="list-style-type: none">• Temporary Agents and Contract Agents• Seconded National Experts



		<ul style="list-style-type: none"> • Trainees • Interims <p>The following categories of personal data are collected for this processing operation:</p> <ul style="list-style-type: none"> • Basic personal information about the staff member, i.e., surname, first name, organisational entity, grade, function group, • Start and end times of staff member's working times on working days, weekends or on bank holidays, • Absences and bank holiday swaps requested, • Declared lunch breaks (if taken), • Declared activities.
9.	Time limit for keeping the data	The records are intended to be retained for 7 years following the end of the year in which they were recorded. However, at present there are technical limitations in automatically aggregating reports required for long term statistical reasons and integration with other systems. EMA is working towards removing this limitation via software update or anonymisation.
10.	Recipients of the data	Line managers and their assistant(s) can see the working time entries from all their staff members and the declared activities. The Head of Administration, the Head of Staff Relations and Support, the Head of Staff Matters, the HR team and the Strategic Planning and Budget service team can see and aggregate the working hours and the activities of all staff members.
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	Not applicable
12.	General description of security measures, where possible.	The Agency has appropriate technical and organisational measures in place, including organisational policies, to safeguard the security of personal data and ensure the confidentiality, integrity and availability of the relevant systems, services and the personal data processed within them. In particular, there are structural authorisations in place, by which managers and their assistants will automatically see only themselves and the data from staff members within the same organisational entity. Detailed information about the applied measures can be found in internal documents. Should EMA staff members wish to learn more about the security of their personal data, they should contact the controller.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	Details concerning the processing of your personal data are available on the Agency's website at: https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement , where you may find the EMA General Privacy Statement as well as the privacy statements on specific data processing operations.