



23 March 2026
EMA/72806/2026

Records of data processing activity on processing of personal data pertaining to staff absence

1.	Last update of this record, version number:	23 March 2026, Version 1		
2.	Reference number:	A-076		
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of Administration and Corporate Management Division Contact: 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)	N/A		
6.	Name and contact details of processor (where applicable)	Processor	Activity	Contact Details
		Laboritas B.V.	Confirmation of sickness absence duration and, if needed, an occupational health assessment of work capabilities; justification for absence based on health status. No medical conditions or records are processed or collected	Europalaan 16 2408 BG Alphen aan den Rijn- The Netherlands ema@laboritas.nl
		Open Text Coöperatief U.A.	Online storage of documents (Document and Record Management System)	Prof. E.M. Meijerslaan 1, 1183 AV, Amstelveen-the Netherlands dpo@opentext.com
		Microsoft Ireland Operations Limited	Microsoft Azure Cloud and MS 365 services and applications to support EMA's administrative tasks and reporting processes	One Microsoft Place, South County Business Park, Carmanhall and

Official address Domenico Scarlattilaan 6 • 1083 HS Amsterdam • The Netherlands

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			Leopardstown, D18 P521, Dublin-Ireland https://www.microsoft.com/en-us/concern/privacyrequest-msa
		SAP Belgium – Systems Applications and Products SA	Operation and Maintenance of EMA’s Human Resource Information System (HRIS) Hermeslaan 9, 1831 Diegem-Belgium privacy@sap.com
7.	Purpose of the processing	<p>For general absences: to accurately record and track staff availability, fulfil regulatory requirements, and ensure precise calculation of salaries, benefits, and allowances. It also enables the Agency to make necessary workload adjustments, plan for interim coverage, and maintain business continuity by identifying and addressing staffing gaps.</p> <p>For long-term absences: to analyse and to monitor patterns and assess the impact on team performance and resource planning. By examining trends in long-term absenteeism, the Agency and managers can make informed decisions about workforce adjustments, ensure sufficient coverage, and proactively support staff well-being.</p> <p>The data processing is further required to facilitate strategic workforce planning, to allow for EMA’s budget forecasting, and to provide evidence for compliance checks, audits, or dispute resolution.</p> <p>Ultimately, processing data on both general and long-term absences allows the Agency to maintain operational efficiency, support fair workload distribution, and uphold a high standard of staff care and accountability.</p>	
8.	Description of categories of persons whose data EMA processes and list of data categories	<p>Temporary Agents and Contract Agents:</p> <ul style="list-style-type: none"> • Notification of sickness absence; • Organisational information; • Information on the duration and type of the absence; • Other information related to the absence. <p>Interims:</p> <ul style="list-style-type: none"> • information as replacements for the staff member in absence. 	
9.	Time limit for keeping the data	<p>Personal data shall be retained for a minimum period of 12 months and, in any event, no longer than until 31 December of the calendar year following the year in which the data were collected, after which they shall be deleted or anonymised.</p>	
10.	Recipients of the data	<p>Personal data will be processed internally by authorised staff members of the Administration and Corporate Management Division handling administrative matters regarding leaves and absences, the Human Resources Business Partners advising line managers in the execution of their tasks, and other staff</p>	

		<p>members in the relevant departments of the Agency involved in the handling of absence requests, teams and staff management and support. Your personal data may also be disclosed, on a need-to-know basis to:</p> <ul style="list-style-type: none"> • the applicable Line Managers, • the (Deputy) Executive Director and their Assistants, • the Internal Audit Service, • the Legal Department, • the Data Protection Officer (DPO)/Data Protection Coordinator. <p>Furthermore, we may share your personal data with the following external institutions, on a need-to-know-basis or when the Agency is required to do so by law, including for monitoring, auditing or inspection purposes in accordance with European Union law:</p> <ul style="list-style-type: none"> • the European Ombudsman; • the Court of Justice of the EU; • the European Court of Auditors; • the European Anti-Fraud Office (OLAF); • the European Public Prosecutor’s Office (EPPO) and the European Data Protection Supervisor (EDPS).
11.	<p>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</p>	<p>In rare instances, the Agency’s processor Microsoft may transfer personal data to third countries (e.g. handling of security incidents due to fraudulent activities). As part of the transfer of such personal data, the Agency’s processors may rely on the following transfer mechanisms:</p> <ul style="list-style-type: none"> • Adequacy decision of the European Commission determining whether a country outside the EU offers an adequate level of data protection or • Standard Contractual Clauses of the European Commission, for the countries where no adequacy decision is in place.

12.	General description of security measures, where possible.	<p>To protect personal data of data subjects, EMA has put in place several contractual safeguards complemented by technical and organisational measures.</p> <p>Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed.</p> <p>Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.</p> <p>Only the authorised staff and nominated contractors coordinating the project have password protected access and only to data not containing any health information.</p>
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	<p>Details concerning the processing of your personal data are available on the Agency's website at:</p> <p>https://www.ema.europa.eu/en/about-us/data-protection-privacy-ema</p> <p>The relevant data protection notice regarding this specific data processing operation is available in the internal Agency's document repository.</p>