



European Economic
and Social Committee

Record of processing activity Part 1

Name of the data
processing:

Remuneration

Created on

17/09/2018

Last update

10/11/2020

Reference number

006

Year

2018

1. Controller:

European Economic and Social Committee

2.a) Service responsible

E2 PER

2b) contact details

SalairesCESE@eesc.europa.eu

3. Joint controller

Not applicable

4. DPO: contact details

data.protection@eesc.europa.eu

5. Processor(s) (where
applicable)

Not applicable

6. Purpose(s) of the data
processing

Calculating the agent's salary and initiation of the process for the payment of salaries.

7. Description of the
categories of persons
whose data are processed

All members of staff (active and retired) as well as their dependants under the Staff Regulations.

8. Description of data categories processed

Professional and personal data in relation to wages and salary:

- administrative address: building, floor, office;
- date of birth;
- institution;
- language;
- city, postal code, staff number, NUP (unique payroll number), nationality, name and surname, country, street, number, post box, gender (m/f);
- telephone;
- title;
- type of beneficiary (active, retired, third party);
- family situation, individual rights and work patterns;
- dependants;
- data concerning career: grade, step, seniority;
- data concerning work patterns;
- Banking information: third party file (ABAC), branch sort code; bank code; bank account; currency.

9. Time limit for retaining the data

Archiving of final results (payslips) for each pay calculation cycle is done by the PMO on CD-ROM for each established pay month.

Data concerning career are retained, particularly in order to determine pension entitlements at the end of the career: a full career represents about 35 years of service. These data must also be kept to allow any corrective recalculation for which no limit has been imposed by the statutory provisions.

The PMO's practice is to have a shelf life of 120 years after the date of birth of the person concerned. In practice, in the case of mass processing, the data is kept on CD-ROM as long as the last person on it remains alive in order to avoid selective rewriting of the medium.

In order to be able to reply to requests from control and supervision bodies, starting from January 2010, the paper file drawn up for the Financial Verification service at the EESC will be kept in the archives of the Salary Sector according to the same principle applied for the career data. Electronic archives and those of the SalairesCESE functional mailbox will be kept in accordance with Article 75 of the Financial Regulation.

The data relating to the decisions on seizure-transfers on salaries are retained for five years after termination of the procedure and then destroyed by the salary service.

10. Recipients of the data

- officials and other staff (active and retired) and their dependants, if any: the salary and pension slips are sent exclusively to the persons concerned;
- Financial Verification service at the EESC;
- Accounting service at the EESC: only data necessary for making a payment to the bank account of the persons concerned;
- PMO: NAP helpdesk;
- DG ECFIN: data on the repayments of the ECSC construction loans;
- Control and supervision bodies: Court of Auditors, OLAF, Ombudsman, EU courts (in case of investigation);
- banks communicated by beneficiaries (only surname, first name, IBAN, salary communication).

Not all users have the same access rights to personal data. The profile of each user (function and responsibilities) determines the needs for access to certain data. For example, information is transferred to another institution in case of a transfer in order to allow the new institution to manage the data. Information can also be transferred for control purposes to institutions competent in this area (Court of Auditors, OLAF, etc.). Information can also be directly transferred by the PMO to Eurostat in order to serve as a basis for the actuarial calculation made in the context of pensions.

11. Transfers of personal data to a third country or an international organisation

Personal data is neither transferred to a third country nor to any international organisation.

12. General description of security measures, where possible

Security measures are integrated into the software used (NAP and SAP Business Objectives Infoview). These programmes are only available to persons who meet the following criteria:

- having the software physically installed on their IT profile;
- having access to the standard EESC platform (login and password);
- being members of the Human Resources and Finance service;
- having a login/password and an active profile in the software used.

13. Privacy statement

[Salaries](#)

Part 2 Compliance check and risk screening

1.a) Legal basis and reason for processing

- necessary for the performance of a task carried out in the public interest
- (a) or in the exercise of official authority vested in the Union institution or body
- (b) necessary for compliance with a legal obligation to which the controller is subject (see point 1b) below)
- processing is necessary for the performance of a contract to which the
- (c) data subject is party or in order to take steps at the request of the data subject prior to entering into a contract

- (d) the data subject has given consent to the processing of his or her personal data for one or more specific purposes
- (e) necessary in order to protect the vital interests of the data subject or of another natural person

[Tick (at least) one of the boxes]

1b) Legal basis

Staff Regulations of Officials and Conditions of Employment of other Servants of the European Union: Title V

2. Are the purposes specified, explicit and legitimate?

Yes
 The legal basis for the payroll process is Title V of the Staff Regulations of Officials and Conditions of Employment of Other Servants of the European Union, mainly:
 Chapter 1, section 1: Remuneration: Articles 62 to 70
 Chapter 2, section 7: Leave in the interests of the service: Article 42c
 Chapter 3: Pensions and invalidity allowance: Articles 77 to 84
 Chapter 4: Recovery of overpayments: Article 85
 Depending on the situation of the agent, the following elements of Title IX of the Staff Regulations could also be taken into consideration:
 Annexes IV and IV bis, VI, VII, VIII, X, XI, XII, XIII
 The CEOS is also applicable

3. Where information is also processed for other purposes, are you sure that these are not incompatible with the initial purpose(s)?

All other purposes are related to payment of salaries.

4. Do you really need all the data items you plan to collect?

All personal data are necessary for calculating the agent's salary and the payment process.

5. How do you ensure that the information you process is accurate?

The controller does not check whether or not the data are correct. All of the information used comes from the different services.

6. How do you rectify inaccurate information?

The persons concerned may contact the data controller to correct their data

7. Are they limited according to the maxim "as long as necessary, as short as possible"?

Yes. Data concerning career are retained, particularly in order to determine pension entitlements at the end of the career: a full career represents about 35 years of service. This data must also be kept to enable any retroactive corrective recalculation for which no limit is imposed by the provisions of the Staff Regulations.

The PMO's practice is to have a shelf life of 120 years after the date of birth of the person concerned. In practice, in the case of mass processing, the data is kept on CD-ROM as long as the last person on it remains alive in order to avoid selective rewriting of the medium.

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8. If you need to store certain information for longer, can you split the storage periods?

No, this is not possible.

9 How do you inform data subjects?

Staff members are informed of the handling process through the privacy statement, which will be published on the intranet.

10. Access and other rights of persons whose data are processed

Staff members can access the data through Sysper.
Data subjects may contact the controller to exercise their other rights.

11. Does this process involve any of the following?

- (a) data relating to health, (suspected) criminal offences or other special categories of personal data
- (b) evaluation, automated decision-making or profiling
- (c) monitoring data subjects
- (d) new technologies that may be considered intrusive

Part 3 Linked documentation

1. Links to threshold assessment and DPIA (where applicable)



No hyperlink inserted

2. Where are your information security measures documented?



No hyperlink inserted

3. Links to other

documentation



No hyperlink inserted

4. Other relevant documents

[Privacy statement in FR](#)