



Eurojust record of processing activity

Record of processing personal data activity, based on Article 31 of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC

Part I –Article 31 Record

Nr.	Item	Description
Activity recording tool		
1.	Last update of this record	December 2022
2.	Reference number	
3.	Name and contact details of controller	Administrative Director of Eurojust, adconfidential@eurojust.europa.eu
4.	Name and contact details of DPO	dpo@eurojust.europa.eu
5.	Name and contact details of joint controller (where applicable)	N/A
6.	Name and contact details of processor (where applicable)	Human Resources Unit hohrconfidential@eurojust.europa.eu
7.	Purpose of the processing	The purpose of processing personal data via the activity-recording tool is to fulfil Eurojust's reporting obligations related to the utilisation of human resources per unit activity and per objective to the annual activity in the Eurojust annual work programme (AWP). These reporting obligations are outlined in Article 28 and 48 of the Eurojust Financial Regulation of 17/09/2019 ¹ . Additionally, the use of this tool will allow Eurojust to validate and refine the planning of human resources in its AWP and make more efficient plans, thus adhering to the principles of sound financial management. In line with the purpose limitation principle, the collected data will be used for the stated purpose only. EJ ACT will not be used for purposes of performance, appraisal, promotion, or assessing contract renewal. Data from the tool shall not be used in any disciplinary procedure.

¹ College Decision 2019-09 of 17 September 2019 On the Financial Regulation applicable to Eurojust.

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8.	Description of categories of persons whose data are processed and list of data categories	<p>Data subjects</p> <p>The use of the tool is mandatory for all Eurojust Temporary and Contract staff, as well as Seconded National Experts (hereby referred to as staff members) working for organisational entities that have their own annual unit plan defined in EJ Activities and Resources Tool (EJ ART) as part of the Eurojust AWP. Other post-holders such as National Members, Deputy Members, Assistants to National Members, interns, interims and external contractors will not make use of the tool.</p> <p>Data categories</p> <p>Data categories include the FTE allocation of each staff member (determined by the staff members themselves) against preassigned unit activities. The unit activities will correspond to those included in the Eurojust AWP of the respective year and prepared in the EJ ART tool. Staff members will have pre-assigned activities by the tool coordinator in the human resources unit.</p>
9.	Time limit for keeping the data	<p>All yearly data included in the tool will be manually deleted by the data processor once Eurojust has received parliamentary discharge for the year when the data was created. In any case, the system will automatically delete the yearly data after two years following their creation.</p>
10.	Recipients of the data	<p>Only staff members themselves will have access to their individual data and no individual data will be shared. A personal report will be available to each staff member at any moment with information on which activity (ies) he/she allocated his/her working time for a certain period. In this way, staff members will be able to verify easily whether they have filled in the activity-recording tool accurately and fully.</p> <p>Heads of entities (units, offices, secretariats) will have access to a report containing only aggregated FTE data recorded against each activity of the entity they supervise. It will not be possible to identify individual staff members in these reports. This type of reporting will support the Head of entity in making more accurate distribution of FTE against activities in future plans and will also lead to a more efficient and proactive allocation of human resources for the whole organisation.</p> <p>Heads of Department will have access to the unit reports for the units they supervise and to a departmental report, containing only aggregated FTE data recorded against each activity of their department. It will not be possible to identify individual staff members in these reports.</p> <p>The Administrative Director as data controller and specific staff within the Human Resources Unit as data processors and coordinators of the tool will have access to unit, department and organisational reports containing only aggregated FTE data recorded against each activity. It will not be possible to identify</p>

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		<p>individual staff members in these reports.</p> <p>The aggregated FTE use per Objective to the Annual Activity will be included in the Consolidated Annual Activity Report.</p> <p>Eurojust does not need to identify individuals via EJ ACT to achieve its stated purpose. For this reason, the tool itself does not intentionally allow for identification of individual staff, as only aggregated reports are available. Heads of entities are instructed to plan their activities in an aggregated way while still ensuring that the activity remains meaningful. Despite these measures, indirect identification of staff might still be possible in certain situations (e.g. small entities, activities performed by defaults by a milted number of staff etc.). In such cases, Heads of entities are reminded that data can only be used for the stated purpose only.</p>
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>No.</p>
12.	<p>General description of security measures, where possible.</p>	<p>In order to ensure full control of the system and the data processed through it, Systems@Work is hosted at Eurojust's premises. Therefore, its implementation follows Eurojust's ICT standards for systems within the internal network.</p> <p>User authentication is based on Eurojust's Active Directory and single sign-on is enabled, which ensures each user can only log in with his/her own identity/account.</p> <p>User authorization is based on user profiles, following the minimum need to know basis to fulfil the purpose. Each user can only access own individual data and aggregated data available to specific users is anonymous.</p> <p>Audit trails (logs) are available so that illegitimate use can be monitored, in case there is a need to review such activity. Access to the activity logs is not available through the system interface and it is restricted to the system administrator, to be used only in case there is an audit requirement or in case there is a personal data breach.</p> <p>The system's supplier follows the industry's best practices and is subject to periodic security audits, including penetration testing, performed by trusted and certified parties. Results are evaluated and recommended actions to robust security are implemented. Once major changes are implemented, the supplier makes updates available to Eurojust.</p>

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13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	Activity Recording Tool Data protection notice