



Record of processing activity

Payroll

Record of EBA activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 (EUDPR)

Nr	Item	Description
Part 1 - Article 31 Record (publicly available)		
1	Last update of this record	02/09/2022
2	Reference number	EBA/DPR/2022/10
3	Name and contact details of controller	Controller: European Banking Authority, Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France Contact: EBA-DPC-HR@eba.europa.eu
4	Name and contact details of DPO	dpo@eba.europa.eu
5	Name and contact details of joint controller (where applicable)	N/A
6	Name and contact details of processor (where applicable)	The data is processed by the EBA together with a third party, the Paymaster Office (PMO) at the European Commission (with Service Level Agreement). European Commission – PMO, Brussels, Belgium The Data Protection Officer (DPO) of the Commission: DATA-PROTECTION-OFFICER@ec.europa.eu
7	Short description and purpose of the processing	The purpose of processing of personal data of data subjects (staff members: Temporary Agents (TA) and Contract Agents (CA)) is to ensure the EBA's compliance with obligations related to paying salaries and communicating the relevant payslips information. TA and CA provide the EBA's HR Unit with relevant information based on which the EBA processes the payroll and payment of salaries as well as assesses the entitlement to specific allowances based on the staff member's personal and/or professional situation. The EBA provides information and any changes to PMO that affect a staff member's remuneration. PMO introduces them into the

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		<p>payroll system (NAP) which generates various reports needed to process the EBA's payroll. The EBA download these reports to be checked and to launch the payroll file for payment.</p> <p>The EBA also take care of payslips distribution that were previously done by PMO through paper version. This is why, while waiting for SYSPER's deployment (the Human Resource Management Information system of the European Commission), the EBA set up monthly staff payslips circulation through password protected email to staff. For emailing the payslips to the staff members a programming code is used to extract the personal payslips per staff member from the PMO payslips report (PDF format).</p> <p>The programming code is saved on the restricted HR Staff drive and it uses the NUP number (unique personnel identification number) and email address of the TA and CA (from a .CSV file) to detect and send the payslips. The payslips are password protected – the code creates every time a new password when the new payslip is sent monthly to the staff members. The password is received by the staff member in a separate email. The extracted payslips once emailed via the application will not be saved on the drive. Staff members choose where to save their payslips once received.</p>
8	Description of categories of persons whose data the EBA processes and list of data categories	<p>EBA HR processes the data of the current and, in certain cases, former EBA staff members.</p> <p>The personal data processed are:</p> <ul style="list-style-type: none"> - Information filled inter alia in the Legal Entity Form as well as the supporting documents provided (e.g.: copy of ID document) related to name, private address, date of birth, nationality, place of recruitment and place of origin, - Personnel number, contract type, category, grade, step, - Family composition: names, dates of birth, private address, employment status of the spouse/partner, registered/recognised partnership, children. - Information filled in the Financial Identification Form (e.g.: bank account, IBAN, BIC) as well as the supporting documents provided (e.g.: bank statement, change of bank account). Where payments need to be made to a third person or third party: identification of the third person or third party (name and surname, complete address, bank account).
9	Time limit for keeping the data	<p>EBA only keeps the relevant personal data for the time necessary to fulfil the purpose of collection or further processing, in line with the European Commission's retention policy.</p> <p>Salary slips and data concerning remuneration and equivalent payments: 8 years after the extinction of all rights of the person concerned and of his dependants but until at least 120 years after his date of birth.</p>

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		Documents linked to attachment of remuneration and equivalent payments: 7 years.
10	Recipients of the data	<p>Designated EBA staff members:</p> <ul style="list-style-type: none"> - EBA HR staff: HR Officers in charge of processing payroll; HR staff members establishing individual rights upon taking up duties and during the career of EBA staff; HR staff members managing leave entitlements (parental leave, family leave, unpaid leave; part-time work). - The Head of the Finance and Procurement Unit and specific Finance Officers/Specialists dealing with the payroll who are processing payments in the Finance and Procurement Unit. - Accounting Officer(s) for payments for Payroll. - The Executive Director of the EBA for payroll approval and payment release. - The Director of Operations when needed to act through delegation of the Appointing Authority for payroll approval and payment release. - IT: if appropriate, specialised members of the IT Unit involved in the management of the Human Resources processes may access the HR electronic folders where the data is stored; no access will be given to the certificates/documents themselves. - The EBA's Legal and Compliance Unit's staff members dealing with complaints submitted under Article 90 of the Staff Regulations. - Designated staff members of PMO of the European Commission dealing with allowances, salaries and pensions. - Access will be given to EU staff with the statutory right to access the data required by their function, i.e. the European Ombudsman, the Civil Service Tribunal, the Internal Audit Service, the European Court of Auditors, OLAF and the European Data Protection Supervisor.
11	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No
12	General description of security measures, where possible	All personal data related to staff are stored in specific electronic personal files and physical paper folders accessible only to the authorised recipients (see point 10 above). Appropriate levels of

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		<p>access are granted on an individual basis only to the above recipients.</p> <p>The personal files and documents provided by staff to the EBA's HR Unit are stored in an access restricted room on the EBA premises. Access to the room is granted to EBA HR staff members with their premises access (magnetic) cards.</p> <p>Electronic personal files are saved on a secure HR drive and it is accessible only for HR staff members.</p> <p>Salaries and payroll info relevant for payroll execution (from HR to Finance and Accounting) is saved on an EBA project drive. Access to the project drive is granted on a need-to-know basis to HR staff members to the Finance and Procurement Unit staff processing the payroll and to the Accounting Officers.</p> <p>Documents and emails exchange with the staff members are stored in separate outlook folders, and accessible only to authorised persons.</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:	The EBA's and the PMO's privacy notices are available on the EBA Intranet.