

*MATRIX application (including Timekeeping) & corresponding Power BI reports)*

The European Union Agency for Fundamental Rights (FRA) processes the personal data of a natural person in compliance with Regulation 2018/1725 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.

This data protection notice explains FRA's policies and practices regarding its collection and use of your personal data, and sets forth your privacy rights. We recognise that information privacy is an ongoing responsibility, and we will update this notice where necessary.

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## 1. Why do we process personal data?

The purpose of the processing of personal data of staff (mainly, data concerning the time spent on a specific task) by FRA is to facilitate an overview over projects, budget, human resources and general progress of FRA's activities to FRA's management.

The processing is necessary to comply with the Activity Based Management principles adopted by FRA and to ensure the proper functioning and management of the Agency.

## 2. What kind of personal data does the Agency process?

We will collect only the following personal data necessary for the processing operation described above.

### (a) General personal data:

- Personal details (name, surname)
- Contact details (email address)
- Employment details (name of the organization)
- Financial details (e.g. financial identification form, bank account information)
- Mission data (flight dates, names & costs for restricted MiPS report, commitments and payments from ABAC which could contain staff names in the description)
- Other:
  - the data concerning the time spent by staff on specific tasks
  - The Office365 software platform (where the MATRIX application and the Power BI reports are stored) distinguishes between the following data categories:
    - Identification data
    - Content data
    - Service generated data (SGD)
    - Diagnostic data

Any of these categories may contain personal data. The operation of this platform requires the processing of data categories above by Microsoft. For further details, please refer to FRA's privacy policy for [Microsoft Office 365](#).

## 3. How do we collect your personal data?

### 3a. Information you provide us

The data concerning the time spent in a specific activity is registered manually either as 'planned time' by the project manager or as 'actual time' by the staff member itself in the MATRIX application, which is directly linked to the planning and implementation of the Agency's activities.

## 1. **MATRIX application consists of the following modules:**

1.1 The Project Management module (PM) includes the management of projects. Here, only the names of the respective project manager is displayed for their respective projects. Within the projects the staff are allocated/planned to specific tasks. The allocation of tasks to staff is available to all staff members (only planned hours are visible, actual recorded hours are only visible to the corresponding staff members) and related reports exist to check the allocated time of staff on project and non-project related tasks. These reports are limited to the respective project managers (for more details please see point 2.1 below). In general, only project managers have access to the PM module. In certain exceptions, HoUs can request for single staff members access rights, this has to be approved by the HoU of CS.

1.2 The ABB module ('Timekeeping') is used by the staff members to report the time they spent on project and non-project related tasks. Whereas planned hours for tasks are visible to all persons who have access to the PM module, actual recorded time is only visible for the respective staff member with the exception of a report for project managers for their projects (for more details please see point 2.1 below). The Finance department generates ABB related reports per area of activity (sectors) in an aggregated manner (no staff identification).

1.3 The Budget module (BM) is used for the budget monitoring of the Agency. This includes the monitoring of the Title I that relates to salaries. These salaries are only displayed in total per year per specific budget line. Access to the budget module is restricted to the related HR personnel and the Budget officer that monitors the overall budget. The related ICT staff have system administration rights for the management of the application.

## 2. **Corresponding Power BI reports**

The following reports display the information from FRA's various systems (MATRIX, ABAC and MiPS) and present it in a lucid and condensed format.

### 2.1 **Ordinary reports**

- MATRIX report: Here the data input from the MATRIX application is displayed. With regards to personnel information, only the name of the project manager is visible. Planned tasks are not visible. All operational staff members have access as well as designated member from Finance.

- Project Dashboards: Here MATRIX data as well as ABAC financial data is visible. With regards to personnel information, only the name of the project manager is visible. Planned tasks are not visible. ABAC financial information is limited to Title 3 & 4 data only. All operational staff members have access as well as designated member from Finance.

### 2.2 **Reports with row level security**

- ABAC report: Here, financial information (Commitment and Payment descriptions) from ABAC is displayed. Information visible for staff members is limited to their field only (HR members have access to only title 1, ICT members have only access to title 2, operational staff members have only access to title 3 & 4).

- Timekeeping report: Here, the actual time recorded in MATRIX is visible. Visibility of personal hours is limited to the respective staff member. For projects managers, visibility is additionally limited to all hours recorded under their projects.
- Missions report: Here, financial information (name, mission destination and mission costs) from MiPS is displayed. Visibility is limited to project managers overseeing costs of their projects only. For further information regarding to data protection of MiPS, please refer to related [data protection notice](#).

#### **4. Who is responsible for the processing your personal data?**

The Agency is the legal entity responsible for the processing of your personal data and determines the objective of this processing activity. The Head of Corporate Services is responsible for this processing operation.

#### **5. Which is the legal basis for this processing operation? FORMATTING**

The management of budget, including planning, monitoring and evaluation of efficient deployment of human resources is necessary for any Union body, such as FRA. More specifically, this is in line with Article 32.2, Article 48 (in particular, point 1 (a) (iii) and 1 (b) second paragraph) of [FRA's Financial Rules of 2019](#) as well as Article 4.1 (g) of FRA's Founding Regulation.

Moreover, FRA's Work Instruction [PR.FIN.009-02](#) establishes the Activity Based Budgeting procedure and the recording of working time at FRA.

Therefore, the processing is necessary for the functioning and management of the Agency and is lawful under Article 5.1.a of Regulation 2018/1725.

#### **6. Who can see your data?**

Only the following staff members can see your data:

- designated FRA staff members in the Corporate Services Unit
- authorized staff according to the need-to-know basis principle: project managers to oversee mission costs and actual recorded time for their projects.

As the MATRIX application is hosted in FRA's cloud, recipients might include Microsoft's personnel managing the databases on Microsoft cloud servers and, if applicable, their sub-processors' personnel on a need-to-know basis. They are bound by confidentiality clauses as per the contract signed with FRA.

## **7. Do we share your data with other organisations?**

Personal data is processed by the Agency only. In case that we need to share your data with third parties, you will be notified to whom your personal data has been shared with.

## **8. Do we intend to transfer your personal data to Third Countries/International Organizations**

No. Transfers of personal data outside the European Union are not foreseen. Data is stored either on the servers of the Agency's Data Centre or in Microsoft datacentres in the EU. However, diagnostic data covered by standard contractual clauses and appropriate safeguards may be sent to Microsoft in the United States. For further details, please refer to FRA's data protection notice for the use of [Microsoft Office 365](#).

## **9. When will we start the processing operation?**

The processing is started when the staff member makes a data entry in Matrix or the staff member is assigned a task in the Timekeeping module.

## **10. How long do we keep your data?**

According to Article 47.3 of the FRA's Financial Rules personal data is (on an entry line basis) is deleted when those data are not necessary for budgetary discharge, control and audit purposes which shall not exceed 5 years after the budgetary discharge. After this period, the information is only stored on an aggregate level, which contains no personal data anymore.

Time recorded by Staff members is deleted at the end of Year N+1 of recording for audit purposes of the Consolidated Annual Activity Report. After this period, the information is only stored on an aggregate level, which contains no personal data anymore.

## **11. How can you control your data?**

Under Regulation 2018/1725, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information. You are not required to pay any charges for exercising your rights except in cases where the requests are manifestly unfounded or excessive, in particular because of their repetitive character.

We will reply to your request without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

You can exercise your rights described below by sending an email request to [Finance.Helpdesk@fra.europa.eu](mailto:Finance.Helpdesk@fra.europa.eu) and the relevant colleagues within the Finance Team.

### **11.1. The value of your consent**

Since the recording of time in MATRIX by staff members is necessary for the management and functioning of the Agency, in line with the applicable legal framework (see section 5 above), you are not required to provide your consent.

## 11.2. Your data protection rights

### a. Can you access your data?

You have the right to receive information on whether we process your personal data or not, the purposes of the processing, the categories of personal data concerned, any recipients to whom the personal data have been disclosed and their storage period. Furthermore, you can have access to such data, as well as obtain copies of your data undergoing processing.

### b. Can you modify your data?

You have the right to ask us to rectify your data you think is inaccurate or incomplete at any time.

### c. Can you restrict us from processing your data?

You have the right to restrict the processing of your personal data. If you do, we can no longer process them, but we can still store them. In some exceptional cases, we will still be able to use them (e.g. with your consent or for legal claims). You have this right in a few different situations: when you contest the accuracy of your personal data, when the Agency no longer needs the data for completing its tasks, when the processing activity is unlawful, and finally, when you have exercised your right to object.

### d. Can you delete your data?

You have the right to ask us to delete your data when the personal data are no longer necessary for the purposes for which they were collected, when you have withdrawn your consent or when the processing activity is unlawful. In certain occasions we will have to erase your data in order to comply with a legal obligation to which we are subject.

We will notify to each recipient to whom your personal data have been disclosed of any rectification or erasure of personal data or restriction of processing carried out in accordance with the above rights unless this proves impossible or involves disproportionate effort from our side.

### e. Are you entitled to data portability?

Data portability is a right guaranteed under Regulation 1725/2018 and consists in the right to have your personal data transmitted to you or directly to another controller of your choice.

In this case, this does not apply for two reasons: I) in order for this right to be guaranteed, the processing should be based on automated means, however we do not base our processing on any automated means; II) this processing operation is carried out in the public interest, which is an exception to the right to data portability in the Regulation.

### f. Do you have the right to object?

When the legal base of the processing is “*necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body*” which is the case in most of our processing operations, you have the right to object to the processing. In case you object, we have to stop the processing of your personal data, unless we demonstrate a compelling reason that can override your objection.

**g. Do we do automated decision making, including profiling?**

Your personal data will not be used for an automated decision-making including profiling.

**11.3.**

The processing is lawful because “the data subject has unambiguously given his or her consent”. Therefore, you have the right to withdraw your consent at any time, and we will delete your data or restrict its processing.

**12. What security measures are taken to safeguard your personal data?**

The Agency has several security controls in place to protect your personal data from unauthorised access, use or disclosure. We keep your data stored on computer systems with limited access to a specified audience only.

**13. What can you do in the event of a problem?**

- a) The first step is to notify the Agency by sending an email to [Finance.Helpdesk@fra.europa.eu](mailto:Finance.Helpdesk@fra.europa.eu) and the relevant colleagues within the Finance Team and ask us to take action.
- b) The second step, if you obtain no reply from us or if you are not satisfied with it, contact our data protection officer (DPO) at [dpo@fra.europa.eu](mailto:dpo@fra.europa.eu).
- c) At any time you can lodge a complaint with the EDPS at <http://www.edps.europa.eu>, who will examine your request and adopt the necessary measures.

**14. How do we update our data protection notice?**

We keep our data protection notice under regular review to make sure it is up to date and accurate.

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