



European Committee  
of the Regions

## Record of processing activity – Working document

### Processing salaries and benefits

#### PART 1 - Record

##### 1. General Information

Reference number	RE1-2
Last update	07/08/2023
Controller	European Committee of the Regions
Directorate	Directorate E
Unit	E.1 Annual budget and finance
Contact details	payroll@cor.europa.eu
Joint controller	N/A
Joint controllership arrangement	Available internally
DPO contact details	<a href="mailto:data.protection@cor.europa.eu">data.protection@cor.europa.eu</a>
Processor(s)	N/A
Data processing agreement	Available internally

##### 2. Purpose and description of the personal data processing

Purpose(s) of the personal data processing	Preparing and authorizing salaries for payment in accordance with the Financial Regulation, the Staff Regulations and the CoR's Internal Financial Rules as materialised in procedures and checklists but relying on the quality of the supervisory and control systems of the HR Units for the data provided.
Categories of persons whose personal data are processed	CoR staff
Categories of personal data processed	<p>-Grade, step and personal number (or name), individual rights and time management of officials and agents (Human Resources units input these data in Sysper2 and Payroll application).</p> <p>- When preparing salaries the Salary Service uses an IT-application provided for by the Pay Master's Office (PMO), NAP, that includes inter alia monetary data. The NAP automatically uses the data in Sysper 2 and in Payroll application when making calculations.</p> <p>-However, data covering exceptional payments and recuperations, percentage of pension contribution for part time, transfers abroad are input directly into NAP by the Payroll Service. The data covering the recuperation of childcare facilities and nursery expenses are transferred from a program managed by OIB</p> <p>-The NAP outputs salary data and it is transferred into the IT-workflow/accounting application ABAC/SAP used for inter alia</p>

	<p>initiation, verification, authorization, payments of salaries and accounting. The actual payments and accounting are done by the Accounting Sector of Unit E1 Annual Budget and Finance.</p> <p>-The Payroll Service input bank account data into SUMMA. The IT-application SUMMA is provided for by DG Budget of the European Commission.</p>
Recipients of the personal data	<p>Data subjects themselves. The payslips are uploaded in Sysper2 (in the module Rights &amp; Privileges, in 'Latest Payslip' and 'Payslips' (starting 2014/04).</p> <p>Staff of Unit E2 (Recruitment and career) and E3 (Working conditions and talent management) for encoding in Sysper2 (see DPN managed by the EC)</p> <p>Staff of Unit EI (Internal control and LAM office, and deputy Head of Unit) in the frame of ex-post exercises.</p> <p>NAP Support, the helpdesk of the PMO (the Pay Master Office), in case there is a specific problem about someone's salary.</p> <p>The CoR's Internal Audit Service can access everything at any point in time.</p>
Transfers of personal data to a third country or an international organization	<p>No, your personal data are not transferred to non-EU member states or to international organisations.</p>
Retention period of the personal data	<p>The data concerning the career and rights are preserved by the HR Units, especially for determining the rights at pension (a complete career represents about 35 years in service).</p> <p>These data have to be kept as well in order to be able to recalculate any retroactivity for which there is no limit imposed by statutory regulation.</p> <p>These data are kept for 5 years in case of decisions of seizures on salaries after the extinction of the procedure.</p>
General description of security measures, where possible	<p>Regarding paper files</p> <p>To prevent unauthorised access to the paper files, the offices are closed and locked by salary staff when unattended.</p> <p>Regarding digital data</p> <ul style="list-style-type: none"> <li>-preventing unauthorised access to the IT systems: for Sysper2, ABAC, SUMMA and NAP we use ECAS passwords (the European Commission's authentication service), for Payroll application passwords are in place, managed by the GAU (segregation of duties) with a written procedure and forms requiring proper authorisation.</li> <li>-preventing unauthorised reading, copying, alteration or removal of the storage media: NAP + ABAC: see the IT procedures in the Luxemburg data centre of the PMO</li> <li>-preventing unauthorised memory inputs [...]: through the use of passwords in Sysper2, Payroll application, NAP, ABAC and SUMMA</li> <li>-preventing unauthorised persons: we access NAP through ECAS passwords (the European Commission's authentication service) and ABAC and SUMMA through TESTA (the network used to communicate among EU institutions)</li> <li>-access to personal data other than those which we have access rights: NAP and ABAC prevent access to non-CoR data. Sysper2 and Payroll application prevent access to confidential data.</li> </ul>

	<ul style="list-style-type: none"><li>-recording which personal data have been communicated: N/A (personal data are not communicated)</li><li>-[log] Sysper2, Payroll application, ABAC and SUMMA contain a log.</li><li>-ensuring that during communication the data cannot be read: n.a. (personal data are not communicated)</li><li>-designing the organisational structure: strict segregation of duties</li></ul>
Data protection notice	Published internally