

**RECORD OF PROCESSING ACTIVITY  
ACCORDING TO ARTICLE 31 REGULATION 2018/1725<sup>1</sup>  
NOTIFICATION TO THE DATA PROTECTION OFFICER**

**NAME OF PROCESSING OPERATION<sup>2</sup>: MATRIX application (including Timekeeping) & corresponding Power BI reports**

Reference number: DPR-2018-029 (to be completed by the DPO)
Creation date of this record: 21/12/2018
Last update of this record: 13/07/2022
Version: 2.0

**Part 1 (Publicly available)**

<b>1) Controller(s)<sup>3</sup> of data processing operation (Article 31.1(a))</b>
<p>Controller: European Union Agency for Fundamental Rights (FRA)          Schwarzenbergplatz 11, A-1040 Vienna, Austria          Telephone: +43 1 580 30 – 0          Email: <a href="mailto:contact@fra.europa.eu">contact@fra.europa.eu</a>          Organisational unit <b>responsible<sup>4</sup></b> for the processing activity: Corporate Services Unit          Contact details: <a href="mailto:Finance.Helpdesk@fra.europa.eu">Finance.Helpdesk@fra.europa.eu</a> and the relevant colleagues within the Finance Team.          Data Protection Officer (DPO): <a href="mailto:dpo@fra.europa.eu">dpo@fra.europa.eu</a></p>

<b>2) Who is actually conducting the processing? (Article 31.1(a))<sup>5</sup></b>
<p>The data is processed by the FRA itself <input checked="" type="checkbox"/></p> <p>The data is processed also by a third party <input checked="" type="checkbox"/></p>

<sup>1</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

<sup>2</sup> **Personal data** is any information relating to an identified or identifiable natural person, i.e. someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity. This information may, for example, be the name, date of birth, a telephone number, biometric data, medical data, a picture, professional details, etc.

**Processing** means any operation or set of operations which is performed on personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

<sup>3</sup> In case of more than one controller (e.g. joint FRA research), all controllers need to be listed here

<sup>4</sup> This is the unit that decides that the processing takes place and why.

<sup>5</sup> Is the FRA itself conducting the processing? Or has a provider been contracted?

The MATRIX application is hosted in the cloud. For services related to the Microsoft Office 365 cloud-based collaboration platform, Microsoft acts as data processor.

Contact details: Microsoft Ireland, South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland.

NOTE: Contacts with Microsoft take place only via the Agency and the Commission. The above information is provided for internal use only.

### 3) Purpose of the processing (Article 31.1(b))

*Why are the personal data being processed? Please provide a very concise description of what you intend to achieve with the processing operation. Specify the rationale and underlying reason for the processing and describe the individual steps used for the processing. If you do this on a specific legal basis, mention it as well (e.g. staff regulations for selection procedures).*

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

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**

1.1 The Project Management module (PM) includes the management of projects. Here, only the names of the respective project manager are 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 spend 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) as well as cost reports for title 4 projects 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 staff 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 [DPR-2022-153](#).

#### 4) Description of the categories of data subjects (Article 31.1(c))

*Whose personal data are being processed?*

- |               |                                     |
|---------------|-------------------------------------|
| FRA staff     | <input checked="" type="checkbox"/> |
| Non-FRA staff | <input type="checkbox"/>            |

#### 5) Categories of personal data processed (Article 31.1(c))

*Please tick all that apply and give details where appropriate*

**(a) General personal data (add or delete as appropriate – the data in the brackets are only examples)**

Personal details (name, surname.)

Contact details (email address)

Education & Training details

Employment details (name of the organisation)

Financial details (Mission data (flight dates, names & costs for restricted MiPS report, commitments and payments from ABAC which could contain staff names in the description)

Family, lifestyle and social circumstances

Goods or services provided

Other (please give details):

➤ The time spent by staff on specific tasks

➤ The Office365 platform 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 the data categories above by Microsoft.

For further details, please refer to [DPR-2020-108: Microsoft Office 365](#)

**(b) Special categories of personal data (Article 10)**

The personal data collected reveal:

Racial or ethnic origin

Political opinions

Religious or philosophical beliefs

Trade union membership

Genetic, biometric or data concerning health

Information regarding an individual's sex life or sexual orientation

N/A

(c) **Personal data relating to criminal convictions and offences** (Article 11)

Criminal record (or similar, e.g. declaration of good conduct)

N/A

6) Recipient(s) of the data (Article 31.1 (d))

*Recipients are all parties who have access to the personal data. Who will have access to the data **within** FRA? Who will have access to the data **outside** FRA? No need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS).*

Designated **FRA** staff members:

- Corporate Services Unit (only designated Staff Members)
- Moreover, authorised staff according to the “need-to-know” principle. (Project managers to oversee mission costs and actual recorded time for their projects)

Recipients **outside** FRA:

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

7) Transfers to third countries or international organisations (Article 31.1 (e))<sup>6</sup>

*If the personal data are transferred outside the European Economic Area or to international organisations, this needs to be specifically mentioned, since it increases the risks of the processing operation.*

**Transfer outside of the EU or EEA**

Yes

No

Transfers of personal data outside the European Union are not foreseen. However, diagnostic data covered by contractual rules may be sent to Microsoft in the United States.

For further details, please refer to [DPR-2020-108: Microsoft Office 365](#)

<sup>6</sup> **Processor** in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty. If needed, consult your DPO for more information on how to ensure safeguards.

***Transfer to international organisation(s)***

Yes

No

If yes specify to which organisation:

***Legal base for the data transfer***

Transfer on the basis of the European Commission's adequacy decision (Article 47)

Transfer subject to appropriate safeguards (Article 48.2 and .3), specify:

a)  A legally binding and enforceable instrument between public authorities or bodies.

Standard data protection clauses, adopted by

b)  the Commission, or

c)  the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2) .

d)  Binding corporate rules,  Codes of conduct ,  Certification mechanism pursuant to points (b), (e) and (f) of Article 46(2) of Regulation (EU) 2016/679, where the processor is not a Union institution or body.

Subject to the authorisation from the European Data Protection Supervisor:

Contractual clauses between the controller or processor and the controller, processor or the recipient of the personal data in the third country or international organisation.

Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.

Transfer based on an international agreement (Article 49), specify:

***Derogations for specific situations (Article 50.1 (a) –(g))***

N /A

Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply In the absence of an adequacy decision, or of appropriate safeguards, transfer of personal data to a third country or an international organisation is based on the following condition(s):

(a) The data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards

(b) The transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request

(c) The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person

(d) The transfer is necessary for important reasons of public interest

(e) The transfer is necessary for the establishment, exercise or defense of legal claims

- (f) The transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent
- (g) The transfer is made from a register which, according to Union law, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down in Union law for consultation are fulfilled in the particular case

### 8) Retention time (Article 4(e))

*How long will the data be retained and what is the justification for the retention period? Please indicate the starting point and differentiate between categories of persons or data where needed (e.g. in selection procedures candidates who made it onto the reserve list vs. those who didn't). Are the data limited according to the adage "as long as necessary, as short as possible"?*

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.

### 9) Technical and organisational security measures (Article 31.1(g))

***Please specify where/how the data are stored during and after the processing; please describe the security measures taken by FRA or by the contractor***

#### **How is the data stored?**

- |  |                                     |
|--|-------------------------------------|
| Document Management System (DMS)   | <input type="checkbox"/>            |
| FRA network shared drive   | <input type="checkbox"/>            |
| Outlook Folder(s)  | <input type="checkbox"/>            |
| CRM  | <input type="checkbox"/>            |
| Hardcopy file  | <input type="checkbox"/>            |
| Cloud (Matrix App and Power BI reports are hosted by the Microsoft 365 cloud-based collaboration platform, where Microsoft acts as data processor) | <input checked="" type="checkbox"/> |
| Servers of external provider   | <input type="checkbox"/>            |

All personal data registered in MATRIX in electronic format are stored either on the servers of the Agency's Data Centre or in Microsoft datacentres in the EU (linked to the Agency's and Commission's Office 365 environment). For further details, please refer to [DPR-2020-108: Microsoft Office 365](#)

## 10) Exercising the rights of the data subject (Article 14 (2))

*How can people contact you if they want to know what you have about them, want to correct or delete the data, have it blocked or oppose to the processing? How will you react?*

See further details in the Data Protection notice: e-mail to [Finance.Helpdesk@fra.europa.eu](mailto:Finance.Helpdesk@fra.europa.eu) and the relevant colleagues within the Finance Team.

### **Data subject rights**

- Right of access
- Right to rectification
- Right to erasure (right to be forgotten)
- Right to restriction of processing
- Right to data portability
- Right to object
- Notification obligation regarding rectification or erasure of personal data or restriction of processing
- Right to have recourse
- Right to withdraw consent at any time