



Record of data processing activity in the context of handling requests and complaints under Article 90 of the Staff Regulations

Last Update of the record	18 th March 2021
Reference number	2021/35
Data controller	Head of the Legal Affairs and Data Protection Sector Contact: edsecretariat@easo.europa.eu
Joint controller (if applicable)	N/A
Data Processor (if applicable)	N/A
Data Protection Officer	dpo@easo.europa.eu
Name of processing activity	The handling of requests and complaints under Article 90 of the Staff Regulations.
Purpose of processing	The purpose of the processing is to respond to requests received under Article 90(1) and to complaints received under Article 90(2) of the EU Staff Regulations More precisely, it consists of the analysis of the request or the complaint as well as other relevant documents in order to establish the facts to which the decision of the Authority Empowered to conclude Contracts of Employment (hereinafter 'AECE') will refer, in the legal assessment of these facts and in drawing up the decision to be adopted by the AECE in response to the request or complaint.
Data categories	Identification and contact information of the requester/complainant, (name, address, e-mail, telephone, fax), professional, case involvement data, and information related to the request/complaint. The data are received from the requester/complainant and from related EASO files.
Description of categories of persons	(Former) staff members (officials, contract agents, temporary agents, etc.) submitting requests and/or complaints within the context of their (former) employment contracts, and related rights and entitlements. Staff members and other persons who take part as candidates in selection procedures organized by EASO.
Time limit for keeping the data	The files relating to requests / complaints are kept by EASO's LDPS for a period of 15 years in order to allow a comparison of precedents and to guarantee a uniform application of the Staff Regulations. These files are

	accessible exclusively to LDPS members. Afterwards this period expires the files are archived.
Recipients of the data	<p>EASO staff responsible for carrying out this processing operation has access to the personal data, as follows:</p> <ul style="list-style-type: none"> • Selection committees, EASO staff other than LDPS members and hierarchy: to the extent necessary to provide the explanations and information essential to the processing of requests/complaints. • LDPS: systematically and compulsorily consulted; prepares draft decisions in response to requests/complaints; access to complete files. <p>Courts of the EU: in the event of a judicial appeal; access to complete files.</p> <p>OLAF, IDOC, IAS and Court of Auditors: on request, and limited to what is necessary for official inquiries or for audit purposes.</p> <p>European Ombudsman or European Data Protection Supervisor: on request and limited to what is necessary for inquiries.</p>
Transfer to third countries or international organisations	N/A
General description of security measures	Personal data will be processed in compliance with all the appropriate technical and organisational measures set to protect personal data against accidental or unlawful destruction, accidental loss or unauthorised disclosure, alteration and access or any other unauthorised form of processing.
How data subjects can exercise their rights to access, rectification, object and data portability (where applicable)	<p>Via e-mail to the data controller: edsecretariat@easo.europa.eu</p> <p>Further information on the processing of your personal data is made available on the Agency's website at: https://www.easo.europa.eu/legal The link above includes EASO's General Privacy Statement as well as the privacy statements on specific data processing operations.</p>