

PRIVACY STATEMENT

for processing of personal data in the context of using Activity Based Management tool (ANAPLAN) at the BEREC Office

The **Agency for Support for the Body of European Regulators for Electronic Communications (BEREC Office)** 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 privacy notice explains the BEREC Office policies and practices regarding its collection and use of your personal data, and sets forth your privacy rights. The BEREC Office recognizes that information privacy is an ongoing responsibility, and, therefore, this notice will be updated when necessary.

1. What is the purpose and legal basis for processing your personal data?

The purpose of processing of the data is to apply the Activity Based Management (ABM) in the BEREC Office. For this purpose, BEREC Office is using an activity based management tool provided by ANAPLAN online software solution. The use of ANAPLAN allows recording and keeping trace of the BEREC staff working time invested in the core BEREC Office activities, which is core data for resource allocation and budget management.

BEREC Office staff authorized to use ABM enters this platform using their registration details (corporate email address and password) on the dedicated login page at Anaplan.com

The lawfulness for the processing operation is Article 5(a) and Article 5(b) of Regulation 2018/1725.

The legal bases of the procedure are:

1. Regulation (EU) No 2018/1971 of the European Parliament and of the Council of 11 December 2018 Article 23(2) and Article 31(1)
2. Decision No MB/2019/13 of the Management Board of the BEREC Office on the financial regulation applicable to the BEREC Office Article 32(2)

2. What personal data is collected and processed

In order to carry out this processing operation, the BEREC Office processes the following categories of data:

1. Identification details: personal data allowing to identify staff members: first name, surname, initials, email, job position, unit, team.
2. Activity-related data: time spent on a certain activity, FTE

Additionally, a login/logout tracking tool collects the login/logout time and the users' name.

Data under sub 2) are entered directly by staff using their ANAPLAN credentials within the ANAPLAN platform log-in page: <https://us1a.app.anaplan.com/home>

For the data processed by ANAPLAN platform (user-related data), please refer to the [ANAPLAN privacy policy](#)

3. Who has access to your personal data and to whom is it disclosed?

Only authenticated BEREC Office users with clearly defined profiles have access to ANAPLAN platform. The profiles (user, admin or model builder) determine the user's rights and the access to functionalities and to relevant data.

In particular, recipients of the data are:

1. The BEREC Office HR professionals in charge of the ABM activities
2. The BEREC Office finance professionals in charge of the ABM activities (Admin/model builders)
3. The BEREC Office staff members in charge of encoding timesheet data (Director, directors assistant, Heads of Units, Team leaders)
4. Anaplan (Processor) personnel: limited to access to users-related data for the purposes of providing the platform, preventing or addressing service or technical problems, responding to support issues.

Access rights for each user group are governed by the “need to know” principle. All recipients of personal data in the framework of this exercise are instructed to process the personal data they receive only for the purpose for which they were transmitted.

4. How long are your personal data kept?

In line with the EC retention list your personal data is to be kept for 5 years after the closure of the financial year.

5. What are your rights?

You have the right to request from the controller access to and rectification or erasure of your personal data or restriction of processing.

You also have the right to object to processing of your personal data and to data portability.

The controller shall provide information on action taken on a request 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.

6. Who is the data controller and how to exercise your rights?

The BEREC Office shall exercise the tasks of the data controller for the purpose of these processing operations

To exercise the mentioned rights, you can contact the controller by sending an email to: personell@berec.europa.eu

If you consider your data protection rights have been breached, you can always lodge a complaint with the BEREC Office's Data Protection Officer (dpo@berec.europa.eu) or with the European Data Protection Supervisor: edps@edps.europa