



PRIVACY STATEMENT

Processing of personal data in the context of personnel management

1. Introduction

The protection of your personal data is of high importance to the Smart Networks and Services Joint Undertaking (SNS JU). SNS JU is committed to respecting and protecting your personal data and ensuring your rights as a data subject.

All personal data processed in the framework of personnel management are handled fairly, lawfully and with due care.

This processing operation is subject to Regulation (EU) 2018/1725. The present privacy statement is provided pursuant to Articles 15 and 16 of that Regulation.

2. Controller

The controller for this processing operation is:

Smart Networks and Services Joint Undertaking (SNS JU)

Avenue de la Toison d'Or 56-60

1060 Brussels, Belgium

Email: data-protection@sns-ju.eu

SNS JU has appointed a Data Protection Officer (DPO), who can be contacted at the same address.

3. Purpose of the processing

Personal data are processed for the management of employment relationships and administrative handling of staff, including:

- management of personal files
- payroll, allowances and financial entitlements
- leave management (annual leave, sick leave, special leave)
- working time and attendance
- missions and travel management
- performance appraisal and evaluation
- telephony and communication tools management

- career management and administrative follow-up
- compliance with legal, administrative and audit obligations.

4. Categories of data subjects

The processing concerns:

- SNS JU staff (temporary agents, contract agents)
- interim staff, trainees and seconded personnel
- former staff members, where relevant

5. Personal data processed and legal basis

Personal data processed

SNS JU may process the following categories of personal data:

- identification data (name, surname, personal number, nationality, date of birth)
- contact details (email, telephone, address)
- professional data (position, function, career history, evaluations)
- administrative data (leave records, working time, missions)
- financial data (salary, allowances, bank details)
- health-related data (limited to sick leave or fitness for work where applicable)
- communication and telephony data
- supporting documents related to employment.

Legal basis

Processing is based on:

- Article 5(1)(a) of Regulation (EU) 2018/1725 (task carried out in the public interest)
- Article 5(1)(b) of Regulation (EU) 2018/1725 (compliance with legal obligations)

Processing is necessary for the application of:

- EU Staff Regulations and Conditions of Employment of Other Servants (CEOS)
- Council Regulation (EU) 2021/2085 establishing SNS JU
- relevant implementing rules and administrative provisions

Processing of special categories of data (e.g. health data) is carried out in accordance with Article 10 of Regulation (EU) 2018/1725.

6. Source of the data

Personal data are:

- provided directly by staff members
- generated during the employment relationship
- provided by competent EU services (e.g. PMO, DG HR)
- obtained from internal administrative systems

7. Recipients of the data

Access to personal data is granted on a need-to-know basis to:

- authorised SNS JU HR and administrative staff

- line managers and relevant supervisors
- the Executive Director (as appointing authority)
- the SNS JU Data Protection Officer (for data protection matters)
- European Commission services (e.g. PMO, DG HR)
- external service providers supporting HR systems, under appropriate safeguards

In specific cases, data may be disclosed to:

- audit, control or judicial authorities where required.

8. Transfers to third countries

In principle, personal data are processed within the European Economic Area (EEA).

Where transfers to third countries occur (e.g. when an applicant is located outside the EEA), they are carried out in compliance with Regulation (EU) 2018/1725.

9. Data retention

Personal data are retained:

- for up to 10 years after termination of employment or after the extinction of all rights

for shorter periods where applicable depending on the type of data (e.g. operational records)

Retention periods are defined to comply with administrative, legal and audit requirements.

At the end of the retention period, data are securely deleted.

10. Security measures

SNS JU implements appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including:

- secure IT systems and controlled access rights
- role-based access to data
- confidentiality obligations for staff and experts
- monitoring and protection of IT infrastructure

11. Rights of data subjects

Under Regulation (EU) 2018/1725, you have the right to:

- access your personal data
- rectify inaccurate or incomplete data
- request restriction of processing
- object to processing

Certain rights may be restricted where necessary to comply with legal obligations, ensure proper personnel administration, or protect the rights of others, in accordance with Article 25 of Regulation (EU) 2018/1725.

Requests can be addressed to: data-protection@sns-ju.eu

SNS JU will reply within one month, which may be extended in complex cases.

12. Complaints

If you consider that your rights have been infringed, you may contact the SNS JU DPO.
You also have the right to lodge a complaint with the European Data Protection Supervisor (EDPS):
European Data Protection Supervisor
Rue Wiertz 60
B-1047 Brussels
Email: edps@edps.europa.eu

13. Further information

The SNS JU public register of processing activities is available at:
<https://smart-networks.europa.eu/data-protection-declaration/>