

# FACTSHEET eMS – GDPR

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New features to comply with GDPR requirements

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Version 1  
05 2018

## A. General remarks

The new Regulation 679/2016 (General Data Protection Regulation – GDPR) introduces strict rules on data protection. Interreg programmes are obliged to collect some personal data necessary for project monitoring. Nevertheless, access to some of the data (e.g. salary information reported by project partners under the budget line staff costs) need to be limited - Only programme bodies responsible for cost verification should be able to see personal data related to salaries of partner employees.

In order to limit access to these data, a new approach was introduced with the eMS version 3\_5.1.

## B. Data access limitations in the “List of expenditure”

Access to personal data in the partner report was hidden (marked as “hidden due to GDPR”) by default for all users except the project partner users (i.e. users given read/write access for the project partner institution in question). Consequently, the project partner user has full access to his/her own report; all other users need a special user privilege to get access.

This special privilege is limited to the assigned controllers and other programme bodies responsible for cost verification.

The following fields are not readable for users not having the special privilege. The text ‘hidden due to GDPR’ is shown instead.

List of Expenditure (LoE):

- fields ‘Description1’ and ‘Description 2’ related to items in budget line 1 staff costs
- ‘comment’ fields (partner comments and controller comments) related to items in budget line 1 staff costs
- All information of these fields is hidden, both in the LoE popup window and overview table.
- In the Interreg Central Europe Programme the uploading of LoE attachments (documentation related to the expenditure item) is generally not allowed and the upload function disabled. Yet,

in principle the eMS is now programmed in a way that for all attachments uploaded to the LoE under the budget line staff costs only a list of files would be visible but without showing the name of the file (the name of the file is replaced by the text " hidden due to GDPR"). Without the special privilege, users cannot download the attachments.

Edit Expenditure  
Partner Report 1 My project partner 2 Period 3 List of Expenditures

<b>PP</b> Budget Line Work Package  Internal Reference Number Invoice Number Invoice Date Date Of Payment  Currency Conversion rate Total Value Of Item In Original Currency VAT Declared Amount In Original Currency Declared amount in Eur  Expenditures Outside (The Union Part Of) The Programme Area? In Kind Purchase Of Land	Staff costs		Description1 Hidden due to G D P R
	M Management		Description2 Hidden due to G D P R
			Partner Comment Hidden due to G D P R
<b>FLC</b> Verified By FLC Difference FLC Amount Certified FLC Flc Correction Type		€ 0.00	Comment Flc (pp.flc.js.ma.ca.aa) Hidden due to G D P R
		€ 0.00	
<b>LP</b> Difference LP Amount Certified LP		€ 0.00	Comment LP
		€ 0.00	

  

Hidden due to G D P R	Uploaded
Hidden due to G D P R	

## C. Data access limitation in "Personal data attachments"

An additional tab called 'Personal data attachments' has now been added to the partner report. All files uploaded in this tab are hidden by default and only visible to the respective project partner user; all other users need the special user privilege to have access. The files are hidden in the same way as in the staff cost items upload, i.e. file title and description is replaced by 'hidden due to GDPR' text.

Partner Report

Period 3 - 18.01.2019 - 17.07.2019

Start Date	End Date
18.01.2019	17.07.2019

Summary of partner's work in this reporting period

Please describe your progress in this reporting period and how this contributed to other partners' activities, # outputs and deliverables delivered in this reporting period.



No records found

Furthermore, it is possible to move files from the "Attachments" section to "Personal data attachments" and the other way round. The project partner user is able to move attachments from one section to the other for his/her own report. For the project partner user, this functionality is always available - independent of the state of the report. All other users would need a separate user privilege to move attachments as well. Currently such separate user privilege for moving attachments was not granted to any other user except the system administrator.

Upload

Attachments

<input type="checkbox"/>	Filename	Filetype	Date	User	Description	Actions	Move to 'personal data attachments' section
<input type="checkbox"/>	2.pdf	pdf	02.05.2018 10:05:28	chrweme3		Comment	
<input type="checkbox"/>	6.pdf	pdf	02.05.2018 10:13:00	chrweme3		Comment	

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