

From: [EMPLOYEE NAME], [JOB TITLE]

To: [EMPLOYER / HR CONTACT]

Date: [DATE]

## Privacy Notice — Personal Working-Time Record

Template provided by OvertimeLog. This is not legal advice. Consult a lawyer if you are unsure whether this notice is appropriate in your jurisdiction.

### 1. Purpose of this notice

This letter informs you that I, [EMPLOYEE NAME], am keeping a personal record of the times I am contacted for work outside of my agreed working hours. I am providing this notice in the interest of transparency and to describe what the record contains, how it is stored, and why I am keeping it.

### 2. Why I am keeping this record

Under the European Court of Justice judgment in *Federación de Servicios de Comisiones Obreras (CCOO) v Deutsche Bank* (Case C-55/18, 14 May 2019), employers are required to establish an “objective, reliable and accessible” system for recording the daily working time of each worker. Where such a system is not yet in place on the employer side, I am maintaining an employee-side record so that my actual working time can be demonstrated if required.

The record also supports my ability to exercise rights under applicable working-time, overtime, and right-to-disconnect legislation where relevant.

### 3. What the record contains

The record is limited to messages I receive or send in workplace chat (for example Slack direct messages) during periods that fall outside my agreed working hours. For each message, the following fields are captured:

| Field             | Description  |
|-------------------|--|
| Timestamp         | The time the message was sent (UTC and local).   |
| Channel           | The name or identifier of the chat where the message occurred (e.g. a direct message). |
| Sender / receiver | My username and the other party's username within the workplace chat system.           |
| Message text      | The literal text of the message.   |
| Permalink         | The link back to the message within the chat system (for verification only).           |
| Evidence hash     | A SHA-256 hash of the captured content, recorded at the time of capture.               |

The record does not contain biometric data, location data, or any information outside of work-related chat messages.

### 4. Where the data is stored

The record is kept only on my personal device, inside a local SQLite database file. It is not synchronized to any cloud service and is not shared with any third party. The software used (OvertimeLog) operates entirely on-device; it does not transmit message content to any external server.

More detail, including the tool's privacy policy and a description of the data it handles, is available at <https://overtimelog.com/privacy.html>.

## 5. Legal basis for this processing

I am processing this information under Article 6(1)(f) of the General Data Protection Regulation (legitimate interests): specifically, the interest in being able to demonstrate my own actual working time and, where applicable, to support claims for overtime compensation. The processing is limited to messages I am already a party to and therefore does not introduce any surveillance of other colleagues.

## 6. Retention

The record will be retained only for as long as necessary to establish or defend claims relating to my working time and overtime compensation, typically in line with the limitation periods that apply to such claims in our jurisdiction. Once the relevant period has elapsed, the record will be deleted or anonymised.

## 7. Rights of other participants in the conversation

Because the record includes messages sent by colleagues who are also parties to the conversation, I recognise that those colleagues have data-subject rights under the GDPR. If a colleague requests a copy, correction, or deletion of messages they sent to me, I will respond in accordance with the applicable law and in good faith.

## 8. Availability of the record

I will make the record available, in whole or in part, in response to any reasonable request from the employer or a regulator in the context of a working-time, overtime, or compliance dispute. I will not disclose the record to third parties outside such a context without an appropriate legal basis.

## 9. Contact

If you have any questions about this notice, please contact me at **[EMPLOYEE EMAIL]**.

Sincerely,

**[EMPLOYEE NAME]**  
**[JOB TITLE]**

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