



# DIGITAL DISCONNECTION POLICY

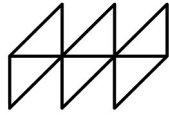
## CENTRE D'ESTUDIS DEMOGRÀFICS



DigitalMediaLegal

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## INTRODUCTION

The introduction of new technologies in the workplace, the acceleration of work digitalization, and the multiple possibilities for networked work allow access to information and communication virtually anywhere and at any time. This flexibility offers numerous advantages but also entails the risk of hyperconnectivity, which can have negative effects on people's physical, mental, and social health.

In this regard, the legal framework has recognized the right to digital disconnection with the aim of ensuring the right to balance professional activity with personal and family life.

Organic Law 3/2018, of December 5, on the protection of personal data and the guarantee of digital rights, recognizes in its Article 88 the right to digital disconnection in the workplace to ensure respect for employees' rest periods, leave, and vacations outside legally or contractually established working hours.

The exercise of this right must consider the nature and purpose of the employment relationship, promote the balance between professional activity and personal and family life, and comply with what is established in collective bargaining agreements or, in their absence, the agreements between the organization and its employees or their representatives, in the case that a Works Council exists.

In particular, in cases of remote work, the right to digital disconnection must be preserved.

This right also entails a duty for employees, especially those with responsibilities, to exercise it properly and ensure its effectiveness.

### 1. OBJECTIVE

The CENTRE D'ESTUDIS DEMOGRÀFICS (hereinafter, the CED) is committed to ensuring the implementation of the right to digital disconnection, as well as the application of digital rights related to the work environment established in Title X of Organic Law 3/2018, of December 5, on Personal Data Protection and Guarantee of Digital Rights (LOPDGDD).

This policy has been defined by the CED's Data Protection Officer (DPO), with the participation of the Manager and the Head of Quality and Regulatory Compliance of the entity. These individuals will constitute the Monitoring Committee, together with a member of the RLPT, if it has been established.

It covers the following areas:

- **DIGITAL DISCONNECTION:** Ensure that, outside legally or conventionally established working hours, rest periods, leave, and vacations are respected, as well as personal and family life.
- **WORK-LIFE BALANCE:** Promote the right to balance professional activity with personal and family life.
- **INTERNAL POLICY:** Develop an internal policy addressed to all staff, including those in management positions, which defines the modalities for exercising the right to digital disconnection, as well as training and awareness actions on the reasonable use of technological tools to prevent the risk of digital fatigue.

The right to digital disconnection is guaranteed regardless of the type of work schedule. Employees shall not be discriminated against in their professional development nor penalized for exercising the right to digital disconnection.

## **2. BASIC CONCEPTS**

- Right to privacy and use of digital devices: CED personnel have the right to privacy in the use of digital devices provided to them. The Centre may access the content derived from their use solely for the purposes of monitoring compliance with labor or statutory obligations and ensuring the integrity of the aforementioned devices.
- Right to digital disconnection in the workplace: Employees have the right to digital disconnection to guarantee, outside legally established working hours, respect for their rest periods, leave, vacations, and personal and family privacy.
- Right to privacy regarding the use of video surveillance devices: CED may process images obtained for monitoring employees within the legal framework.
- Right to privacy regarding the use of geolocation systems: CED may process geolocation data obtained for monitoring employees within the legal framework.

## **3. DIGITAL DISCONNECTION**

CED guarantees its personnel the right to digital disconnection once the working day has ended.

The disconnection policy applies regardless of whether the work is performed on-site or remotely.

In this regard, employees have the right not to respond outside working hours to communications and messages from the workplace received via electronic means and, more broadly, the right not to interact with electronic or digital environments for work-related purposes, with the exceptions set out in section 6 of this document.

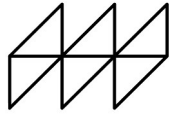
CED recognizes the right to digital disconnection as a right for all its personnel, but not as an obligation. This explicitly implies that employees who communicate outside the established hours must assume that they will not receive a response until the next working day, except in the situations described in section 5 of this document and using the mechanisms provided therein.

For these purposes, all devices and tools capable of extending the working day beyond legal limits will be considered, in particular: laptops, CED mobile applications, emails, CED chat, or any other tool that may be used.

No punitive measures will be taken against those who effectively exercise their right to digital disconnection. Exercising the right to digital disconnection may not negatively affect professional promotion processes.

## **4. INTERNAL POLICY**

Personnel must act at all times in accordance with the instructions established in this Digital Rights Policy. For this reason, the following protection measures are established, which personnel are obliged to comply with:



#### **4.1. Use of Digital Devices**

Employees have the right not to attend to digital devices outside their working hours, nor during rest periods, leaves, licenses, and/or vacations, and not to read or respond to any communication, regardless of the medium used, unless justified urgent circumstances arise.

Exceptional circumstances may be considered when there are situations that could pose a serious risk to individuals or potential harm to CED, urgency requiring the application of special measures or immediate responses, or cases of force majeure described in section 5.

Personnel must make rational use of the digital work tools available to them and avoid using them outside working hours unless circumstances justify it. These devices must be disconnected outside legal working hours and may only be connected in cases where circumstances warrant it.

#### **4.2. Geolocation**

Any geolocation devices of employees, including vehicles if applicable, and electronic devices with this functionality, must be deactivated by the employee outside of working hours.

#### **4.3. Communications**

Personnel are neither expected nor encouraged to continue checking possible messages or calls related to their work once the agreed working day has ended or during vacation periods.

In general, communications regarding work matters should take place during working hours. Therefore, requests for responses to messages sent outside the regular working day should be avoided, with the sender assuming that the response and, if applicable, management of the communication will take place during the next working day, unless urgent or force majeure circumstances arise.

If communications are necessary for tasks that require extending the working day, it is assumed that responses will be made during the next working day, unless urgent or force majeure circumstances occur. When communications are sent outside working hours, it is preferable to use delayed or scheduled sending so that the communication is received during working hours.

Exceptionally, when the employee's role makes it advisable or convenient to check the corporate email or, where applicable, the corporate messaging application once the usual working hours have ended, a written agreement will be signed specifying a fixed time or time window during which the review must be carried out.

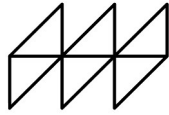
#### **4.4. Work Meetings**

Meetings shall be held within the limits of the working day, respecting rest periods and applicable holidays.

Meeting invitations shall include the start and end times, as well as the relevant documentation to be discussed, so that topics can be reviewed and analyzed beforehand. Meetings shall not extend beyond the established time limits.

#### **4.5. Extension of the Working Day**

Situations in which the working day is extended by more than 15 minutes due to justified circumstances will be compensated with equivalent time off, subject to prior approval by the CED Management in accordance with applicable legal regulations.



The CED provides staff with a Working Hours Registration system (ROL) in accordance with Article 34.9 of the Spanish Workers' Statute. This register includes the specific start and end times of the workday.

#### **4.6. Absence Management**

At the end of the working day, the day before starting vacation, or in the event of absences, it is recommended that the employee activate the automatic absence reply on their corporate email account, indicating the contact person responsible during their absence and the date when work will resume. Likewise, the voicemail of the telephone extension, if a corporate phone is available, shall be activated with an absence message as indicated above.

### **5. EXCEPTIONS**

The measures set forth in this policy shall not apply in circumstances of urgency, extreme necessity, or force majeure that could cause serious harm to the provision of services or to the CED if not addressed by the employee.

In such cases, if a response is required after the end of the working day or during rest periods, contact should be made with the employee preferably via their corporate email or through the communication channel previously agreed upon with the work team.

This policy also does not apply to individuals with specific responsibilities: the management team, service managers, the ICT manager, and the coordinators of the Consolidated Research Groups, who must attend to communications in accordance with the provisions established for their type of working schedule.

In these cases, outside the hours considered regular, contact should preferably be made via the employee's corporate email or through the communication channel previously agreed upon with the work team to locate the recipient, as established in Section 6 of this document. Any time the employee dedicates outside of working hours due to these circumstances will be compensated with days or hours of leave, subject to prior authorization by CED Management.

### **6. INFORMATION AND COMMUNICATION, TRAINING, AWARENESS**

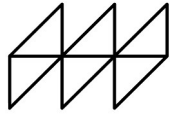
Information, training, and awareness regarding the right to digital disconnection must be communicated to all staff in a clear and unequivocal manner. The CED will implement training and awareness actions for staff on the use of technological tools and the right to digital disconnection, paying special attention to issues such as psychosocial risks and digital fatigue, and this information will be kept up to date.

Employees with responsibility over a team must pay special attention to this policy and ensure that their team is informed about it.

To implement this policy, it is essential that all staff are aware of it so that everyone contributes to its application.

**Information and communication:** To ensure that all staff are aware of this policy and have access to the document, the CED will publish the policy on the entity's intranet and include it in the onboarding documents for new staff.

**Training and awareness:** To acquire the necessary skills and ensure the effective use of digital tools while minimizing negative effects, the CED will promote general training for all staff and specific training for those in positions of responsibility or who manage teams. The CED will also encourage good practices for responsible digital disconnection.



Good practices are considered to be:

- Ensure that communications are sent exclusively to the people involved and contain only the essential information, simplifying content whenever possible.
- Encourage the use of the “delayed send” option for emails sent to employees outside their working hours.
- Set up automatic replies during periods of absence, indicating the dates when the employee will be unavailable and providing the email or contact details of the person assigned to handle tasks during that absence.
- Limit scheduling of training sessions, meetings, videoconferences, presentations, or informational sessions outside each employee’s working hours.
- Promote the use of videoconferencing and audio-conferencing to conduct meetings within working hours and reduce unnecessary travel, whenever possible.
- If meetings must be held outside an employee’s working hours, attendance will be voluntary and will be considered effective working time. This measure will be especially applicable to employees with reduced working hours due to family care responsibilities.

## **7. REVIEW OF THE DIGITAL DISCONNECTION POLICY**

This Policy may be reviewed annually by the Monitoring Committee, composed of the CED management and the person responsible for the quality and regulatory compliance system of the CED, with the aim of incorporating necessary improvements and updates.

The Monitoring Committee has the following functions:

- Monitor the implementation of the measures described in this policy, and evaluate and report compliance indicators.
- Collect suggestions, opinions, and improvement proposals from internal collaborators, as well as complaints received through the communication channel established for this purpose.
- Analyze incidents related to the application of this policy.
- Evaluate the policy in light of regulatory changes affecting it.
- Promote guarantees to ensure the effective exercise of the digital disconnection right of employees.

## **8. COMMUNICATION CHANNEL**

The CED establishes the following email address: [compliance@ced.uab.es](mailto:compliance@ced.uab.es)

to collect suggestions, opinions, and improvement proposals, reports from commissions or working groups, and complaints from CED staff.

This digital disconnection policy will enter into force on the date of its approval, as stated below.