

WOJCIECH RAFAŁ WIEWIÓROWSKI ASSISTANT SUPERVISOR

Head of Human Resources Service CEDEFOP P.O.Box 22427 GR-55102 Thessaloniki GREECE

Brussels, 19 October 2017 C 2017-0171 Please use edps@edps.europa.eu for all correspondence

Subject: Prior-checking Opinion regarding the updated notification for the promotion procedure at CEDEFOP (EDPS case 2017-0171)

Dear,

On 20 December 2016, the European Data Protection Supervisor (EDPS) received a notification for prior checking under Article 27 of Regulation (EC) No 45/2001¹ ("the Regulation") on the promotion procedure from the Data Protection Officer (DPO) of CEDEFOP.²

As indicated by CEDEFOP's DPO, this notification replaces the one analysed in EDPS case 2012-0009 (EDPS register number 820)³. Therefore, this Opinion analyses and highlights only those practices which diverge from the earlier notifications and which do not seem to be in conformity with the principles of the Regulation.

Having analysed the changes made, there appears to be no need for a new Opinion.

However, the EDPS would like to draw your attention to the fact that the recommendations issued in the abovementioned Opinion, in particular as regards the obligation to remind all data recipients of the purpose limitation principle, are valid also for the new recipient, i.e. the Staff Committee.

The EDPS would also like to stress the importance of properly informing the data subjects and welcomes the fact that CEDEFOP states that it has updated the privacy statement to reflect all changes.

Tel.: 32 2-283 19 00 - Fax: 32 2-283 19 50

¹ OJ L 8, 12.1.2001, p. 1.

² As this is an ex-post case, the deadline of two months does not apply. This case has been dealt with on a best-effort basis.

³ We have therefore updated our register of notifications accordingly.

In light of the accountability principle, the EDPS expects that CEDEFOP take due account of these reminders and has therefore decided to **close the case**.

Please note that we will include the updated notification (without security measures) in the public register.

Yours sincerely,

Wojciech Rafał WIEWIÓROWSKI

Cc.: Data Protection Officer, CEDEFOP