

REGISTER NUMBER: 489

NOTIFICATION FOR PRIOR CHECKING

Date of submission: 13/03/2009

Case number: 2009-192

Institution: EACI

Legal basis: article 27-5 of the regulation CE 45/2001⁽¹⁾

(1) OJ L 8, 12.01.2001

INFORMATION TO BE GIVEN⁽²⁾

(2) Please attach all necessary backup documents

1/ Name and adress of the controller

Mr Guido de Clercq, Head of Unit, EACI, Madou 04/09, B-1049 Brussels

2/ Organisational parts of the institution or body entrusted with the processing of personal data

Unit ressources (team "human ressources")

3/ Name of the processing

Management of traineeships

4/ Purpose or purposes of the processing

To ensure the selection and recruitment of traineeships. The Commission publishes a call for trainees twice a year. For the description (which is a bit long) see Annex IV.

5/ Description of the category or categories of data subjects

Candidate trainees, trainees and ex-trainees

6/ Description of the data or categories of data (*including, if applicable, special categories of data (article 10) and/or origin of data*)

Basic data revealing name, forename, maiden name, gender and marital status, nationality, date, place and country of birth; data revealing educational background (start and end date of study, date and level of degree, university name and location, field of study and specialisation, main subject, marks or grade awarded); data revealing professional experience (employer's name, starting and end date, type of employment and task description); data revealing knowledge of languages (language name and proficiency in speaking, writing, reading, understanding and translation level), data revealing special european works or studies, data revealing computer skills, data concerning preferences and motivation for applying, preferred DG's or agencies and reason, data containing permanent address and contact details and data revealing emergency and contact addresses (name, address, telephone, fax, e-mail of contact persons). See Annex I (application form of the Commission).

7/ Information to be given to data subjects

Right to access and rectification is granted to the data subjects and they are informed through a two privacy statements. The first privacy statement (Annex II) is posted in the website of the Commission and available at the time of application; the second one is given manually to the trainees that have been selected (Annex III).

8/ Procedures to grant rights of data subjects (*rights of access, to rectify, to block, to erase, to object*)

These rights are granted through oral or written request (see privacy statements)

9/ Automated / Manual processing operation

Both. Part of the processing operation is automatic (access to the VBB) and part is manual as far as the selection is done on a case-by-case basis.

10/ Storage media of data

The storage is made in the VBB (only accessible by the stage coordinator with a special password). The paper files are deleted and no paper storage is made at all. The recruited trainees are encoded in the data base SIC-PERS in order for them to obtain a log in and a password. The data encoded in SIC-PERS are only the name, date and place of birth and nationality. The recruited trainees are as well encoded in SIC-CONGES (for the management of the holiday request, to verify that at the end they have not exceeded ten days of holiday). These applications are only accessible by the human resources sector by a special password.

11/ Legal basis and lawfulness of the processing operation

Article 5(a) of Regulation (EC) No45/2001 and Article 5(d) of the same Regulation (unambiguous consent).

12/ The recipients or categories of recipient to whom the data might be disclosed

The stage advisor(s) and the stage coordinator

13/ retention policy of (categories of) personal data

Five years of retention period following the date of budgetary discharge for the recruited stagiaires. Once the five years have elapsed, only the necessary data for providing a copy of the trainee certificate can be stored (for a maximum period of 50 years). These necessary data are the following: information on the duration of the traineeship, the department to which the trainee was assigned, the name of supervisor and the nature of the work performed.

13 a/ time limits for blocking and erasure of the different categories of data

(on justified legitimate request from the data subject)
(Please, specify the time limits for every category, if applicable)

5 days.

14/ Historical, statistical or scientific purposes

If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification,

not applicable

15/ Proposed transfers of data to third countries or international organisations

not applicable

16/ The processing operation presents specific risk which justifies prior checking (*please describe*):

AS FORESEEN IN:

Article 27.2.(a)

Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,

Article 27.2.(b)

Processing operations intended to evaluate personal aspects relating to the data subject,

Article 27.2.(c)

Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

Article 27.2.(d)

Processing operations for the purpose of excluding individuals from a right, benefit or contract,

Other (general concept in Article 27.1)

17/ Comments

Please note that the pre-selection in the VBB is made by the EAC and the EACI cannot control the retention period of the data stored in the VBB (which belongs to the Commission)

There are the following annexes attached to the notification form for prior checking:

Annex I : Application form of the Commission (test, simulation); Annex II: Privacy statement posted in the Commission website; Annex III: Privacy statement handed manually to recruited trainees; Annex IV: Description of the processing operation.

PLACE AND DATE:

DATA PROTECTION OFFICER:

INSTITUTION OR BODY: