

To be filled out in the EDPS' office

**REGISTER NUMBER: 596**

**NOTIFICATION FOR PRIOR CHECKING**

Date of submission: 25/05/2010

Case number: 2010-0393

Institution: EMCDDA

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 address of the controller

Mr. Dante Storti, Head of Unit Administration (EMCDDA. Cais do Sodre. 1249-289. Lisbon, Portugal)

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

Human Ressource Service (a Sector within the Unit Administration)

3/ Name of the processing

Recruitment of trainees

4/ Purpose or purposes of the processing

The purpose of the processing is the recruitment of trainees. Traineeships vacancies are published by the EMCDDA once a year and applications shall be submitted between 1 November and 31 December every year. Applications received outside the above-mentioned time frame will not be considered. Applicants to a traineeship shall submit the MS Excel 'Traineeship application form', together with a fully completed CV Europass format:  
<http://europass.cedefop.europa.eu/europass/home/vernav/Europasss+Documents/Europass+CV/navigate.action> to the following email address: [traineeships@emcdda.europa.eu](mailto:traineeships@emcdda.europa.eu). The EMCDDA's Human resources management sector screens applications to make sure they are valid and transmits them to the EMCDDA's Heads of unit according to the priority given by the applicant on the application form. Heads of unit will select candidates on the basis of their qualifications and, where necessary, telephone interviews with candidates may be organised. Traineeships will be offered to the successful candidates, where there is agreement on the starting period and length of the traineeship. These two variables are not predetermined.

<p>Candidates are requested to provide information on their availability at the time of their application. Given the high quantity of applications received, the EMCDDA will only contact successful candidates. Candidates who have not heard from the EMCDDA at the end of the month of March in the year following submission of their application shall consider that their application has been refused. Admission to a traineeship at the EMCDDA does not confer on trainees the status of official or other servants of the Communities and in no way entitles trainees to be appointed/engaged by the EMCDDA. For more details on the procedure please refer to the EMCDDA traineeships policy (attached).</p>
<p>5/ Description of the category or categories of data subjects</p>
<p>Applicants that answer to a call for expression of interest launched by the EMCDDA.</p>
<p>6/ Description of the data or categories of data (<i>including, if applicable, special categories of data (article 10) and/or origin of data</i>)</p>
<p>Data to identify and contact the applicant: name, e-mail address, country of residence, telephone, date of birth, nationality, university degrees and languages spoken. Any data relevant to demonstrate, in the framework of the selection procedure, that the applicant fulfils the profile advertised in the call for expression of interest (if any) or to demonstrate to be able to be an added value to the institution as to positively assess the application (CV in European format).</p>
<p>7/ Information to be given to data subjects</p>
<p>Data subjects have full access to the EMCDDA traineeships policy that is made available on the EMCDDA's vacancies internet webpage, which also includes a privacy statement</p>
<p>8/ Procedures to grant rights of data subjects (<i>rights of access, to rectify, to block, to erase, to object</i>)</p>
<p>Applicants are informed of their rights and have always the possibility to access to their data, verify or correct it according to the privacy statement attached.</p>
<p>9/ Automated / Manual processing operation</p>
<p>n.a</p>
<p>10/ Storage media of data</p>
<p>The data collected can only be accessed by designated EMCDDA staff working for the Human Resources Management Sector. The data is stored in the Human Resources Management Sector's offices in locked cabinets. Data in electronic format will be kept in a password protected drive for the exclusive use of HR personnel.</p>
<p>11/ Legal basis and lawfulness of the processing operation</p>
<p>The processing of the data implies an assessment of incoming applications. Therefore, it falls within the scope of Article 27 of the Regulation. The processing is made on the basis of the traineeships policy approved by the EMCDDA Director on 21 January 2010 (attached).</p>
<p>12/ The recipients or categories of recipient to whom the data might be disclosed</p>
<p>Staff members of the EMCDDA. HR staff, heads of unit for the assessment of the applications and where appropriate their staff members, the Director for decision.</p>
<p>13/ retention policy of (categories of) personal data</p>

Data will be stored in the EMCDDA's files as follows:

Data regarding accepted paying trainees will be kept for seven years as of termination of the period of internship or of the last payment. Data regarding accepted non-paying trainees will be kept for one year, starting from the time when the trainee concerned leaves the EMCDDA services. Data concerning non-recruited applicants will be destroyed at the end of the year for which they applied. After the mentioned period only data needed to provide overall statistics on the exercise (total number of applicants, total number of trainees, etc.) will be kept anonymous.

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)*

The right to rectification can only apply to the factual data processed during the concerned call for expression of interest for an internship. The mentioned right can only be exercised up to the closing date for submissions of applications. The Controller shall deal with the applicants request for rectification or erasure of data without delay.

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,*

After the conservation time indicated under 22.a., only data needed to provide overall statistics on the exercise (total number of applications, total number of trainees, etc.) will be kept for statistical reasons. These statistics are not subject to Regulation 45/2001 since they are anonymous and cannot be used to identify one or more persons either directly or indirectly.

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

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,

X 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,

Other (general concept in Article 27.1)

17/ Comments

PLACE AND DATE: Lisbon, 25,05,2010

DATA PROTECTION OFFICER: Cecile MARTEL

INSTITUTION OR BODY:EMCDDA