

(To be filled out in the EDPS' office)
REGISTER NUMBER: 904

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NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 05/10/2012

CASE NUMBER: 2012-0854

INSTITUTION: EUROPEAN TRAINING FOUNDATION (ETF)

LEGAL BASIS: ARTICLE 27-5 OF THE REGULATION CE N° 45/2001⁽¹⁾

INFORMATION TO BE GIVEN²

1/ NAME AND ADDRESS OF THE CONTROLLER

MS. MADLEN SERBAN, DIRECTOR OF THE EUROPEAN TRAINING FOUNDATION (ETF)
VILLA GUALINO, V.LE SETTIMIO SEVERO 65, I-10133 TORINO, ITALY

2/ ORGANISATIONAL PARTS OF THE INSTITUTION OR BODY ENTRUSTED WITH THE PROCESSING OF PERSONAL DATA

Administration – Human Resources Unit

3/ NAME OF THE PROCESSING

Promotions

4/ PURPOSE OR PURPOSES OF THE PROCESSING

The purpose of the processing is ensuring merit base recognition by upgrading most deserving staff.

¹ OJ L 8, 12.01.2001.

² **Please attach all necessary backup documents**

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

All ETF statutory staff members.

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA (*including, if applicable, special categories of data (Article 10) and/or origin of data*).

Staff Surname, first name, function group, grade, job title, job function and information related to the performance (performance appraisal).

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

Data subjects are informed about the scope of the processing and the outcome of the processing. The list of staff member eligible for promotion is public as well as the decision of the promotion board (available in intranet).

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS
(Rights of access, to rectify, to block, to erase, to object)

The rights of data subject are granted through the following procedure: a written request (including emails) by Data Subject addressed to Data Controller with the request to access/rectify/block/erase or object.

9/ AUTOMATED / MANUAL PROCESSING OPERATION

Manual

10/ STORAGE MEDIA OF DATA

The paper file, composed by assessment grid and report, is kept in a closed cupboard inside HR offices and electronically on HR restricted network.

Certification of 3rd language is kept in the personal file.

Memo from RO on recommendation of staff and amendment of contract are inserted in the personal file.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

The Staff Regulations, CEOS and implementing rules for statutory staff and conditions of employment of Local Agents. The EC common rules laying down the procedure for implementing article 45.2 of the Staff Regulations.

12/ THE RECIPIENTS OR CATEGORIES OF RECIPIENT TO WHOM THE DATA MIGHT BE DISCLOSED

ETF staff members in the Human Resources Unit, the ETF Director, members of the Promotion Board appointed, RO, ECA, IAS.

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

Memo from RO and certification of 3rd EU language are inserted in the personal file and consequently the retention period as for personal file is applicable.

Report of the Promotion Board is retained for five years following publication of the Director's decision on promotion, except in case of litigation.

The Director's Decision on promotion is retained for unlimited period of time.

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS

One month from the receipt of the request.

(Please, specify the time limits for every category, if applicable)

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.

Personal data of the present processing are stored for longer period for anonymous statistics (how many persons per year, gender, department etc.)

15/ PROPOSED TRANSFERS OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

No.

16/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING *(Please describe):*

AS FORESEEN IN:

ġ Article 27.2 (b)

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

Performance of data subject is evaluated for the promotion.

ġ Article 27.2 (d)

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

The outcome of the process might be the exclusion of the data subjects from the promotion.

17/ COMMENTS

PLACE AND DATE: TURIN,

DATA PROTECTION OFFICER: MS. TIZIANA CICCARONE

INSTITUTION OR BODY: THE EUROPEAN TRAINING FOUNDATION