

*(To be filled out in the EDPS' office)*  
REGISTER NUMBER: 1174

*(To be filled out in the EDPS' office)*

### NOTIFICATION FOR PRIOR CHECKING

**DATE OF SUBMISSION: 04/10/2013**

**CASE NUMBER: 2013-1092**

**INSTITUTION: EC**

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

### INFORMATION TO BE GIVEN<sup>2</sup>

1/ NAME AND ADDRESS OF THE CONTROLLER

CONTROLLER : PAPAIOANNOU EMMANOUIL-GEORGIOS

E-MAIL: [Emmanouil.Papaioannou@ec.europa.eu](mailto:Emmanouil.Papaioannou@ec.europa.eu)

DELEGATE : PERSSON-DE PELECIJN GUNILLA

E-MAIL: [Gunilla.Persson@ec.europa.eu](mailto:Gunilla.Persson@ec.europa.eu)

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

THE EUROPEAN COMMISSION

DG DEVCO - DIRECTORATE R.4

3/ NAME AND DESCRIPTION OF THE PROCESSING

NAME: Staff rotation exercise in EU Delegations

The yearly Rotation exercise is launched each autumn in order to enable transfer of officials in the interest of the service, to, from and in between the EU Delegations. In order to participate in this exercise, candidates must apply through a dedicated IT-tool (IPM tool) that has been developed in order to facilitate the selection procedure both for candidates and for the selection committee.

---

<sup>1</sup> OJ L 8, 12.01.2001.

Candidates are informed about the details of the Rotation exercise, including guidelines and the Commission Decision C(2012) 7200 on management of resources in the EU Delegations as well as the Privacy statement regarding handling of personal data through the home page of DG DEVCO. On this page is also published the link to the IPM tool through which the candidates must apply.

The candidate will apply by registering personal data such as first name, surname personal number, category and grade, administrative address, professional and private telephone number, current and previous assignments, citizenship, date of birth and preferred countries. On a voluntary basis, the candidate may add other personal information that could be of interest for the selection committee, such as interest for a double posting or family status (see also point 6 of this notification).

The IPM tool has been developed in collaboration with DEVCO.R.6 (IT Unit) to enable on-line applications and uploading of CV, motivation letter and training map by the candidates. The data is exported into excel tables and used to facilitate the selection procedure and to ensure the harmonizing and equal treatment of applications. Candidates are being pre-selected following pre-defined selection criteria by a dedicated selection committee composed of members appointed by the geographical and thematic Directors. Selection criteria taken into consideration for each post is education and diplomas, previous experience, expertise in a specific field and language skills. The aim is to try to match the profile of the candidate to the requirements of each published post. The pre-selected candidates are thereafter either offered a post matching their qualifications, or being interviewed by the selection panel. Each candidate is notified by e-mail on the outcome of their application. On 1 September each year the candidates will move to their new destination, either to a Delegation or back to Headquarters (in the case of a non-successful application). The assignment is done in Sysper2 by DEVCO.R.4 or the HR unit of the other DGs concerned. The movement in Sysper2 generates automatically an AIPN act which is the only trace left regarding each candidate. The applications (CV, motivation letter, evaluation sheets or other related documents such as training map or yearly evaluation report) are not kept but destroyed after 12 months.

#### 4/ PURPOSE OR PURPOSES OF THE PROCESSING, AND PROCESSORS

In the framework of the staff rotation exercise (cf. COMDEL decision mentioned under point 8 below), the purpose of the development of this tool was to facilitate the registration and treatment of the applications submitted by the candidates. The administration of the applications was formerly done manually, i.e. by encoding all data "by hand". With the development of an excel "data base" using the information transmitted by the candidates through the IPM tool, the handling of the applications has been made more efficient and user friendly.

PROCESSORS: None

#### 5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

Candidates participating in the annual Rotation exercise.

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

First name, surname, personal number, category and grade, administrative address, professional and private telephone number, professional and private e-mail, current and previous assignments, citizenship, date of birth and preferred countries.

On a voluntary basis, the candidate may add other personal information that could be of interest for the selection committee, such as interest for a double posting, family status or health condition (e.g. possible problems if confronted to difficult climate environments). The latter is in no way compulsory but the candidate has the right to inform the selection committee of professional and/or private issues that he/she might consider important for his/her application.

Data are not transmitted to any party outside the selection committee and will in no way be used for other purposes. The data is destroyed within a delay of 12 months. ,

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

See specific privacy statement, attached.

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

In case the candidate wants to verify which personal data is stored, have it modified, corrected or deleted, the candidate should address an e-mail to the functional mail box DEVCO ROTATION (EuropeAid-ROTATION@ec.europa.eu) and explicitly specify his/her request. The DEVCO Rotation Team will ensure that the request by the candidate is followed up (for more info see privacy statement attached to point 7 above).

9/ AUTOMATED / MANUAL PROCESSING OPERATION

Manual operation

10/ STORAGE MEDIA OF DATA

Excel files.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

COMDEL decision of 10/10/2012 (C(2012)7200/29 on the Management of Commission Resources in Union Delegations

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

The Director, Head of Unit and Deputy Head of Unit of DG DEVCO Resources Directorate, the DEVCO Rotation Team in DG DEVCO Resources Directorate, the geographical Directors and Heads of Unit in DG DEVCO, assistants to the geographical Directors in DG DEVCO, Heads of HR and responsible desk officers in DG TRADE and ELARG and staff in charge of the technical aspects and maintenance of the IT tool in DG DEVCO.

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

Data must be kept throughout the annual Rotation exercise, including the reclamation period, i.e.12 months. After this period data will be destroyed and no longer available for candidates or any other service. However, the candidate can change his/her data in the application for by sending a request to the functional mail box DEVCO ROTATION (EuropeAid-ROTATION@ec.europa.eu). The request will be treated within 10 working days.

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

The time limit for blocking and erasing of the different categories of data is 10 working 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.*

N/A

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

N/A

16/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING

Article 27.2.(b) Processing operations intended to evaluate personal aspects relating to the data subject

17/ COMMENTS

None

PLACE AND DATE: BRUXELLES, 04.10.2013

DATA PROTECTION OFFICER: RENAUDIÈRE PHILIPPE

INSTITUTION OR BODY: THE EUROPEAN COMMISSION