

(To be filled out in the EDPS' office)
REGISTER NUMBER: 1278

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NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 17/11/2014

CASE NUMBER: 2014-1067

INSTITUTION: EUROPEAN INVESTMENT FUND

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

INFORMATION TO BE GIVEN²

1/ NAME AND ADDRESS OF THE CONTROLLER

European Investment Fund (EIF)
37B, Ave. J.F. Kennedy,
L - 2968 Luxembourg

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

EIF Human Resources

3/ NAME OF THE PROCESSING

Recruitment of EIF non-agents

4/ PURPOSE OR PURPOSES OF THE PROCESSING

Collection, registry, maintenance, transfer and assessment of personal data for the purpose of selection and hire of non-employees (interim staff, trainees, summer students, staff seconded from other organisations)
Meeting temporary staff needs, acquiring expert know-how, providing a "first hands-on" experience to young students or graduates participating in specific projects and initiatives

¹ OJ L 8, 12.01.2001.

² **Please attach all necessary backup documents**

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

Non-employees: the following categories are not considered staff members of EIF:
interim staff, trainees, students for summer jobs, secondees

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA

(including, if applicable, special categories of data (Article 10) and/or origin of data)

For all categories: personal data (name, first name and type of category), emergency contact details

For trainees only: the above information and address, nationality and second nationality, if applicable, birthday and correspondence language, cv, medical certificate confirming that the trainee is fit for work (provided on the trainee's first day at the EIF). Trainees with a disability are entitled to increase their monthly allowance; a simple medical certificate is sufficient to grant this allowance. This information is provided by the recruited trainees on a voluntary basis. They are informed of the possibility of the allowance in the EIB Guidelines on In-House Training, which apply mutatis mutandis to EIF as a consequence of the procedural alignment of working conditions between EIF and EIB.

For secondees only: the above information, address, nationality and second nationality, request and conditions for secondment, cv.

For summer students: name, first name, address, e-mail, telephone (optional), second nationality (optional), birthdate

For interim staff: cv through interim agency - data stored in EIB Group information system (PeopleSoft), name first name

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

The information concerning the data subject's rights to access, rectify, block or to erase their personal data is contained in the publication of the vacancy for trainees and summer students and in the contractual arrangements with the candidates and interim agencies. In addition, all data protection rules applicable to EIF Staff apply fully to all categories of non-employees for the duration of their work for EIF and they are invited to all internal training and awareness sessions on data protection.

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

(Rights of access, to rectify, to block, to erase, to object)

Applicants may exercise their rights on the basis as explained in the data protection communication referred to above under 7)

9/ AUTOMATED / MANUAL PROCESSING OPERATION

Automated Processing:

Application data is entered into the EIB Group PeopleSoft system, which is jointly managed by EIB Personnel for both EIB and EIF. For further description see EIB Art. 27 notification no. 2009-0254 (annexed)

Manual Processing:

Hard-copy application documents are kept secure in a vault under two key lock. The keys are kept at distant places. Access requires the approval of the Head of HR.

Personality tests:

In practice, the EIF does not carry out personality tests for non-employees. To the extent tests on personality and professional skills are part of the selection process in line with the process applied within EIB, documents shall be kept with the external service provider, access is restricted to members of the selection panel and the applicants, see EIB Art. 27 notification no. 2009-0254 (annexed)

10/ STORAGE MEDIA OF DATA

see EIB Art. 27 notification no. 2009-0678 (annexed)

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

EIF Statutes, Staff Rules and Staff Regulations

HR Manual of Procedures

Service Level Agreement EIF - EIB

EIB guidelines for in-house training and corresponding guidelines (cf. EIB Art. 27 notification no. 2009-0678)

EIF Statutes

Relevant Luxembourg law for interim staff as well as contracts signed between the EIF and students (cf. documents provided with EIB notification no. 2009-0678)

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

EIF HR Staff

EIB HR Staff to the extent involved in the system processing of EIF Staff matters

Chief Executive and Deputy Chief Executive

Requesters

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

Data is retained for the periods indicated below following departure:

Interim staff: (paper files) three years - indefinitely for statistical purposes in PeopleSoft

Trainees: (paper files) three years (for reasons of establishing working certificates): indefinite for statistical purposes in PeopleSoft

Secondees: three years following the end of secondment - indefinite for statistical purposes in PeopleSoft

Summer students: (paper files) three years

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS
(Please, specify the time limits for every category, if applicable)

cf. 13 above

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)

cf. 13 above

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

N/A

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

The recruitment process is modelled on the basis of the EIB recruitment process, as the procedural employment framework is aligned for all staff within EIB Group. cf. notification from EIB to EDPS no. 2009-0678. Personal data as described above may be given to EIB. To be noted that to the extent any medical certificate is issued by the EIB medical centre such process follows the process applicable in EIB for EIB Group (cf. also notification EIB to EDPS no. 2005-0396).

To the extent issues are not covered by the specific EIF internal documentation, EIB policies and guidelines are applied mutatis mutandis

PLACE AND DATE: LUXEMBOURG, 15 NOVEMBER 2014

DATA PROTECTION OFFICER: J. NEUSS

INSTITUTION OR BODY: EUROPEAN INVESTMENT FUND

1278/2014-1067