

*(To be filled out in the EDPS' office)*  
**REGISTER NUMBER: 1286**

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**NOTIFICATION FOR PRIOR CHECKING**

**DATE OF SUBMISSION: 27/11/2014**

**CASE NUMBER: 2014-1103**

**INSTITUTION: CEPOL**

**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

Mr Roeland Woldhuis  
Head of Corporate Services Department  
European Police College (CEPOL)  
O utca 27  
1066 Budapest  
Hungary

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

Corporate Services Department, HR function

3/ NAME OF THE PROCESSING

Staff recruitment of Temporary Agents and Contract Agents

4/ PURPOSE OR PURPOSES OF THE PROCESSING

The main purpose of processing is to enable personal data collection and processing for the evaluation, selection and recruitment of Temporary Agents and Contract Agents. The processing involves evaluation of personal aspects relating to the Data Subject, including his/her ability, efficiency and conduct.

The data collected from the candidates is necessary and relevant for the needs of the recruitment

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

<sup>2</sup> **Please attach all necessary backup documents**

procedure; the categories of data are specified in the vacancy notice and on the application form in advance of the collection.

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

Candidates for the positions of Temporary Agents  
Candidates for the positions of Contract Agents

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

All candidates (mandatory):

First name, surname, address, postcode, daytime telephone, e-mail, nationality, date of birth, country of birth, education and training, work experience, period of notice required (in months) to leave present post, knowledge of languages (understanding, speaking, writing)

Shortlisted candidates (mandatory; in addition to the above):

Bank account details (if the attendance is reimbursed), legal entity details (if the attendance is reimbursed), passport/ID card, diplomas, certificates of previous work experience

Recruited candidates (mandatory; in addition to the above):

Pre-employment medical check-up data (aptitude certificates only; sensitive data concerning health is not collected per se and medical reasons are not requested to be disclosed), marriage certificate (if applicable), birth certificates of child(ren) (if applicable), certificate of good conduct (police certificate), references

#### 7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

The data subjects are provided with the following information: Identity of the Data Controller  
The legal basis of the processing operation  
Information about the purpose of the processing  
The categories of data processed  
The recipients of the data  
The existence of right of access and rectification  
The time limits for storing the data  
The right to recourse to the EDPS at any time

As a general rule, if Data Subjects are asked to answer certain questions as regards their personal data, they are informed if the answers are voluntary or obligatory.

The candidates are informed about the purpose of the processing of personal data in the recruitment process by providing the Privacy Statement in the vacancy notice (TE.HR-005).

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

Data Subjects have the right to access their personal data and the right to correct any inaccurate or incomplete personal data. Data Subjects can obtain from the Data Controller the rectification of inaccurate or incomplete personal data concerning them. Data Subjects have the right to object

to the processing of the data.

Substantiated requests should be e-mailed to the HR function at

[FM.Human-Resources@cepol.europa.eu](mailto:FM.Human-Resources@cepol.europa.eu)

General requests can be e-mailed to the CEPOL Data Protection Officer at [dpo@cepol.europa.eu](mailto:dpo@cepol.europa.eu)

#### 9/ AUTOMATED / MANUAL PROCESSING OPERATION

The processing operations are manual and automated (electronically).

#### 10/ STORAGE MEDIA OF DATA

The data are stored in hard copies in locked file cabinets in the Corporate Services Department (HR function) and in electronic form in the dedicated drive 0 folders accessible to the HR function only. Access is provided to a strictly limited number of staff (see p. 12 "The Recipients or Categories of Recipient to whom the data might be disclosed").

#### 11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

Article 5(a) of Regulation (EC) 45/2001

Article 5(d) of Regulation (EC) 45/2001

Articles 28 and 33 of the Staff Regulations, Articles 12(d), 13(2) and 83(2) of the CEOAS (pre-recruitment medical exams); the replies to the questions are obligatory since all the documents requested are necessary to facilitate the recruitment process

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

HR function

Appointing Authority (when concluding a contract of employment)

Internal Audit Service of the European Commission (upon justified request)

European Court of Auditors (upon justified request)

#### 13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

Aptitude certificates of pre-recruitment examinations are part of personal files kept by the Agency's HR function. Files where the aptitude certificates are stored, are kept for a maximum period of 10 years after the end of the period during which a staff member is in active employment or the last pension payment.

For non-recruited persons, results from their pre-recruitment checks are kept for 2 years, a period during which it is possible to challenge the data or the negative decision taken on the basis of that data.

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)

Time limit to block/erase on justified legitimate requests from the data subjects is 15 working days starting from the date of receipt of such request.

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)

Data is not stored for longer periods than mentioned above for historical, statistical or scientific purposes.

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

Data is not transferred 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,)

The processing may involve processing of personal and sensitive data related to health.

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
N/A

PLACE AND DATE: BUDAPEST, HUNGARY 07/10/2014

DATA PROTECTION OFFICER: MRS LEELO KILG-THORNLEY

INSTITUTION OR BODY: EUROPEAN POLICE COLLEGE (CEPOL)