

REGISTER NUMBER: 1351

NOTIFICATION FOR PRIOR CHECKING

Date of submission: 15/12/2015

Case number: 2015/1102

Institution: European Investment Fund

Legal basis: article 27-5 of the regulation CE 45/2001⁽¹⁾

(1) OJ L 8, 12.01.2001

INTERNAL MOBILITY ⁽²⁾

(2) Please attach all necessary backup documents

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

EIF Internal Mobility

4/ Purpose or purposes of the processing

Collection, registering, maintenance, transfer and assessment of personal data with a view to manage internal applications for vacancies within EIF and within the EIB Group.

References: EIB notification to the EDPS no. 2009-253 - EIF notification to the EDPS nos. 2014-0861 and 2014-1067

5/ Description of the category or categories of data subjects

All EIF Staff

To apply for an internal vacancy candidates need a minimum of two years seniority in the service of the EIB Group

Candidates with fixed-term contracts are only eligible to apply during the last third of their total contract duration. However, in the case that no candidates fulfilling the above criteria apply for an internal vacancy, a

6/ Description of the data or categories of data (*including, if applicable, special categories of data (article 10) and/or origin of data*)

Name

Employee ID

Date of birth

Nationality

Gender

Contract type (fixed-term - indefinite)

Contract term, if fixed

Date of contract

CV containing prior work experience and languages

EIF/EIB internal cv

Internal and external training courses attended

Motivation letter

Applications are made on-line. In the context of the application all data other than the data contained in the motivation letter referred is stored and accessed electronically via PeopleSoft.

7/ Information to be given to data subjects

Following his/her application, the candidate receives an automatically generated acknowledgement of receipt.

A candidate profile is automatically generated using the data contained in PeopleSoft.

A hyperlink in the vacancy description leads to a users' guide, which contains, inter alia, a model for internal candidatures

8/ Procedures to grant rights of data subjects (*rights of access, to rectify, to block, to erase, to object*)

Informations relating to the rights of candidates as data subjects in compliance with the Regulation (EC) 45/2001 are indicated in the electronic information system PeopleSoft on the page describing the eligibility of candidates. Once the application is accepted, the candidate may access his/her data through the "self-service" functionality in PeopleSoft. For posts of Head of Division and higher, personality tests are performed with the support of external service providers. To the extent of his/her selection, the candidate has the right to receive and discuss the results of any report resulting from such tests, but only once the selection process is terminated. The system PeopleSoft is administered centrally for EIF and EIB by the EIB Personnel Department. Staff has access to permanently stored personal data and may correct such data; in addition Staff is reminded once a year to perform such corrections (see EIB Art. 27 notifications nos. 2009-0253 and 2009-0254).

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 notifications nos. 2009-0253 and 2009-0254 .

10/ Storage media of data

see EIB Art. 27 notifications nos. 2009-0253 and 2009-0254 ; data is stored centrally in the EIB systems and to the extent data is stored on hard copies, such hard copies are kept in a locked cupboard accessible only to authorised members of HR

11/ Legal basis and lawfulness of the processing operation

EIF Statutes
EIF Staff Rules
EIF Staff Regulations
HR Manual of Procedures
Service Level Agreement EIF - EIB
EIB guidelines on internal mobility

12/ The recipients or categories of recipient to whom the data might be disclosed

EIF Chief Executive/Deputy Chief Executive
EIF HR team and hiring managers
EIB Personnel team

13/ retention policy of (categories of) personal data

Data is retained for three years following the closure of the selection process and indefinitely for statistical purposes in PeopleSoft

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)

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

Within EIB Group, as Internal Mobility includes intra-Group mobility
No transfer to third countries or other IFIs foreseen within the notified process

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.(d)

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

17/ Comments

The process is modelled on the basis of the EIB process on internal mobility, as the procedural employment framework is aligned for all staff within EIB Group. cf. notification from EIB to EDPS no. 2009-0253. Personal data as described above may be given to EIB.

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

18/ Measures to ensure security of processing (3)

Please check all points of Article 22 of Regulation (EC) 45/2001.

(3) Not to be published in the EDPS' Register (article 27.5 of Regulation (EC) 45/2001)

PLACE AND DATE: Luxembourg, 15 December 2014

DATA PROTECTION OFFICER: J. Neuss

INSTITUTION OR BODY: European Investment Fund

To be filled out in the EDPS' office

EDPS OPINION

Of date:

Case number:

Follow up *(in case of acting measures to be taken)*

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