

REGISTER NUMBER: 1391

NOTIFICATION FOR PRIOR CHECKING

Date of submission:05/09/2017
Case number:2016-0771
Institution: EEAS
Legal basis: article 27-5 of the regulation CE 45/2001(1)

(1) OJ L 8, 12.01.2001

INFORMATION TO BE GIVEN⁽²⁾

(2) Please attach all necessary backup documents

1/ Name and address of the controller

Controller:

European External Action Service (EEAS)

Directorate/Division responsible for managing the personal data processing operation:

MDR.C3 - Selection and Recruitment of Contract Agents, SNEs, Junior Experts in Delegation and Trainees

At the time of the notification – in charge of the management of personal data processing:

Diego Mellado Pascua

Head of Division - MDR.C3 - Selection and Recruitment of Contract Agents, SNEs, Junior Experts in Delegation and Trainees

EEAS Parc 07/271

Contact person/team delegated for managing the processing operation: Monika Solis, Head of Sector, EEAS JOY 07/531

2/ Organisational parts of the institution or body entrusted with the processing of personal data

BA.HR.2

3/ Name of the processing

Selection and administrative management of Blue book trainees in EEAS Headquarters and in EU Delegations

4/ Purpose or purposes of the processing

The purpose of the data processing operation is to manage the administrative procedures for Blue Book Trainees at EEAS Headquarters and in EU Delegations with regard to two sessions every year (March - July; October-February).

5/ Description of the category or categories of data subjects

Data are processed from the following individuals or group of people:

Blue Book Trainees (CVs stored in the virtual Blue Book database).

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

Data processed are the following:

I. Data processed from the trainees:

Full Name

Address

Gender

Date and place of Birth

Nationality

Blue book candidate number

Place of assignment of the trainee

Duration of the traineeship

Educational background, qualifications and skills

Data regarding professional experience

CVs and motivational statements

7/ Information to be given to data subjects

A Privacy Statement linked to this Notification contains all information provided to the Data Subject(s).

The aforementioned distinct Privacy Statement is available on the intranet, EEASzone.

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, as well as to request the removal of their personal data, which will be implemented within 5 working days after the request will have been deemed legitimate. If the data subject has any queries concerning the processing of his/her personal data, s/he may address them to the data controller at the following functional mailbox:

trainees-hq@eeas.europa.eu

9/ Automated / Manual processing operation

Data are collected by DG EAC and made available for EEAS on the virtual Blue Book IT application.

10/ Storage media of data

Electronic archives:

Outlook: folders only accessible to staff members of BA.HR.2

SYSPER 2: personal data stored and accessible to staff members involved in the management of trainees' files

Virtual Blue book application accessible for all staff during the selection period only; accessible for the Trainee coordinator with pass.

Paper archives:

The information on the list of trainees with their assignment is kept in locked cupboards or in locked Archives room.

11/ Legal basis and lawfulness of the processing operation

Service Level Agreement of 07/07/2014 <http://www.cc.cec/Ares/renditionDownload.do?itemId=090166e598663a02>
([Ares2014-2249212](#))

Further legal reference:

Good administrative practices in the framework of the Treaty of Lisbon and the Council Decision of 26 July 2010 establishing the organisation and functioning of the European External Action Service (2010/427/EU) available on http://www.eeas.europa.eu/background/docs/eeas_decision_en.pdf

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

EEAS BA.HR.2 designated staff dealing with blue book trainees;

Designated staff in EEAS divisions hosting a Blue Book trainee (including the advisor of the trainee);

Designated staff in EC DG EAC Traineeship Office Unit - dealing with recruitment and management of Blue book

13/ retention policy of (categories of) personal data

EEAS will destroy all personal data maximum two years after the end of the traineeship. Only the list of hosting departments remains in the document management system (Ares). Retention of files by DG EAC is covered in its specific notification (EC DPO-1145.2)

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)

Justified requests are treated within 5 working days after the request will have been deemed legitimate.

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,

Dealt with by DG EAC of the European Commission

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,

N/A

Article 27.2.(b)

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

YES. Potential candidates for the traineeship are assessed during the selection procedure both by DG EAC and EEAS in order to check eligibility and the suitable profiles and the trainees are evaluated at the end of their traineeship in an end of traineeship report by their advisor.

Article 27.2.(c)

Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

N/A

Article 27.2.(d)

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

N/A

Other (general concept in Article 27.1)

N/A

17/ Comments

Description

EEAS manages the procedure the administrative procedures for Blue Book Trainees at EEAS Headquarters and in EU Delegations in cooperation with DG EAC Traineeship office through a service level agreement (Ares2014-2249212). The Traineeships Office Unit ensures the confidentiality in the processing of trainees' personal data, according to the Regulation (EC) N 45/2001 on data protection.

The administrative management of selection of blue book trainees at EEAS Headquarters includes:

I - Preselection phase - preselection of candidatures into the Blue book

1. DG EAC Traineeship Office provides anonym files of candidatures on an on-line platform, the files are password (ECAS) protected by DG EAC;
2. Only selected EEAS staff has temporarily access to it during the preselection phase;
3. After the preselection the access is withdrawn and no paper copies are kept.

II Selection phase - selection of trainees from the Blue book

1. DG EAC Traineeship Office provides access to all EEAS staff to the virtual Blue book (files of trainee candidates); The files do not contain contact details (phone, e-mail address, postal address, etc) of the trainee candidates.

2. The Office of the Managing Directors communicates their proposals to the Trainee coordinator of the EEAS. The Trainee coordinator books the selected candidates in the Blue Book database and forwards the list of candidates by Ares to DG EAC Traineeships Office Unit.

III During the traineeship

The EEAS applies the rules governing the official traineeships programme of the European Commission.

During the traineeship, the EEAS is responsible for the everyday management of the recruited trainees and communicate any relevant information concerning its trainees. The EEAS does not manage files of trainees in relation to their recruitment (placement offer); to their financial compensation (monthly allowance) or reimbursement of expenses (travel, etc.) therefore do not possess data in relation to these operations.

During the traineeship period the traineeship coordinator monitors the leave days of the trainees.

At the end of the traineeship period an evaluation report is prepared by the advisor and shared between EEAS and EC DG EAC.

PLACE AND DATE: Brussels, 05.08.2016

DATA PROTECTION OFFICER: Savoia-Keleti Emese

INSTITUTION OR BODY: European External Action Service