

REGISTER NUMBER: 1392

NOTIFICATION FOR PRIOR CHECKING

Date of submission: 02/09/2016
Case number: 2016-0772
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:

EEAS.BA.HR.2 Selection & Recruitment

formerly 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, EEAS.BA.HR.2, Selection and Recruitment

Contact person/team delegated for managing the processing operation: Brigitte Raepsaet, BA.HR.2 (former MDR C.3)

Co-controller

EU Delegation of each specific third country and international organisation (Head of Delegation and Head of Administration)

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

EEAS BA.HR.2

3/ Name of the processing

Selection, Recruitment and Administrative Management for Junior Professionals in EU Delegations (JPDs)

4/ Purpose or purposes of the processing

The purpose of the processing operation is to process personal data of JPDs in relation to personnel selection procedures, establishment of rights, payment of allowances and other entitlements, and to other administrative matters.

5/ Description of the category or categories of data subjects

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

Junior Professionals in EU Delegations

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

Data, including personal data, processed are communicated in the following documents:

personal data submitted for the purposes of selection, establishment of rights, payment of allowances and other entitlements

Application forms

Selection panel reports

Traineeship Agreements between EEAS/COMMISSION and JPDs

Financial Identification (bank details)

Legal Entity (personal data, official address)

Other materials related to JPDs traineeship (passport, university diplomas, language certificates, judicial record etc.)

Data collected include:

name,

date and place of birth,

gender,

nationality,

marital status,

family composition,

official address

emergency contact details, etc.

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

(<http://intragate.ec.europa.eu/eeas/eeaszone/?q=node/26247>) as well as on the website of the EEAS

(http://www.eeas.europa.eu/data_protection/rights/index_en.htm).

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:

selection-and-recruitment@eeas.europa.eu

9/ Automated / Manual processing operation
Data is collected manually on electronic tools.

10/ Storage media of data
Electronic archives

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

Drive "Group Share" (drive 'Y'): selection related files are only accessible to staff members of EEAS BA.HR.2

SYSPER2: personal data stored and only accessible to staff members of EEAS BA.HR.2 in charge of JPDs (ECAS

Pay4SNE: personal data stored and only accessible to staff members of EEAS BA.HR.2 in charge of JPDs (ECAS

ARES: only accessible to staff members involved with selection

Paper archives: EEAS BA.HR.2 paper archives are in locked cupboards on BA.HR.2 premises or in Archives rooms.

11/ Legal basis and lawfulness of the processing operation

Joint Decision of the Commission and the High Representative of the European Union for Foreign Affairs and Security Policy of 12.06.2012 establishing a High Level Traineeship Programme in the Delegations of the European Union and the Rules Governing this Programme in Partnership with the Member States of the European Union (JOIN(2012) 17 final)

Decision of the Chief Operating Officer of the European External Action Service In agreement with the Directors-General of DG DEVCO and DG HR of the European Commission of 22/01/2014 on the Implementing Rules of the High Level Traineeship Programme in the Delegations of the European Union in Partnership with the Member States of the European Union (EEAS DEC(2014) 002)

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

The recipients of the data are the following, on a strict "need-to-know policy" basis:

EEAS MDR C.3 assigned staff

Heads of Division and possibly other dedicated staff in the division relevant for the particular recruitment

Heads of Delegation and Head of Administration in EU Delegations ? Co-controllers processing personal data (CVs and other material)

Members of selection panels including [representatives of Council, Commission and EEAS, Appointing Authority](#)

13/ retention policy of (categories of) personal data

As per the European Data Protection Supervisor's Guidelines concerning the processing operations in the field of staff recruitment https://secure.edps.europa.eu/EDPSWEB/webdav/site/mySite/shared/Documents/Supervision/10_Guidelines_staff_recruitment_EN.pdf, the recruited applicants' data will be retained for a maximum of 10 years as of the termination of the traineeship.

As for the non-recruited applicants, data will be retained for a maximum of 2 years.

The data will be destroyed after the aforementioned period.

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 has 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,

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 (*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. The selection process aims at evaluating the data subject. (Data include CV, motivation letter and selection panel report.)

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

Coordination of the preparation, selection and administrative management for JPDs posted in EU Delegations

Brief description of the process:

Coordination of the recruitment process for JPDs in Delegations

Establishment of the rights of JPDs in Delegations

Operational and financial initiation and verification

Preparation and processing of the financial documents necessary for monthly payments of allowances

Payment of monthly allowances (grant, accommodation contribution and hardship contribution) via Pay4SNE

Payment of installation contribution, contribution towards the cost of the journey and contribution towards the cost of the
Coordination with relevant services involved in the implementation of the programme

PLACE AND DATE: Brussels, 05.08.2016

DATA PROTECTION OFFICER: Emese Savoia-Keleti

INSTITUTION OR BODY: European External Action Service