

REGISTER NUMBER: 890

NOTIFICATION FOR PRIOR CHECKING

Date of submission: **23/08/2012**

Case number: **2012-0706**

Institution: **CEDEFOP**

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

Ginette Manderscheid
Head of Human Resources
Cedefop
P.O.Box 22427
GR-55102 Thessaloniki
Greece

2 a/ Part of the institution or body entrusted with the processing of personal data

HR staff in charge of the attestation procedure under the supervision of the Head of Human Resources

3/ Name of the processing

Attestation procedure of Cedefop officials (ex-C and ex-D categories)

4/ Purpose or purposes of the processing

The purpose of the attestation procedure is to select officials employed in categories C (AST 1-7) or D (AST 1-5) before 01.05.2004 who may become members of the assistants' function group without restrictions.

The attestation procedure comprises three stages:

- 1) publication of a call for applications;
- 2) identification of the applicants eligible and establishment of a list of admitted applicants;
- 3) attestation on post at "Administrative assistant" level¹.

There will be one attestation exercise to be implemented in the autumn of 2012.

¹ All posts functions corresponding to category B* are considered at "Administrative assistant" level.

For more details on the procedure please see attached Cedefop DGE 16 /2012.

5/ Description of the category or categories of data subjects

Cedefop officials as defined in Art.1 /Staff Regulations in the C and D career paths who were in service in the institution before 1 May 2004.

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

- name and surname;
- personnel number;
- function group;
- educational qualifications;
- professional experience;
- performance levels (CDR).

7/ Information to be given to data subjects

The data subject is informed of his/her rights and is able to access his/her data, verify or correct it according to the Privacy statement attached. The Information to Data Subjects is posted on Cedefop intranet. It will be made available at the launch of the attestation procedure.

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

Staff members may consult their personnel file at any time in the HR office. In addition, in line with article 26 of the Staff Regulation, the staff members have right of access to all the documents contained in their personal files even after leaving the service.

Regarding the right to rectification, officials to be attested may correct only factual and administrative data.

The right of blocking will be dealt on a case by case basis in accordance with the Cedefop Code of Good Administrative Behaviour, in particular articles 14 (acknowledgement of receipt) and article 17 (reasonable time for taking decisions).

9/ Automated / Manual processing operation

This is a paper-based processing operation.

10/ Storage media of data

A paper copy of the request is stored in the personnel file of the staff member together with the Attestation decision. Files are stored in locked cupboards within the Human Resources Service.

11/ Legal basis and lawfulness of the processing operation

Article 10 (3) of Annex XIII to the Staff Regulation
Cedefop DGE 16 /2012 – General implementing provisions laying down the rules for implementing the attestation procedure

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

- joint attestation committee;
- the Director in his capacity of Appointing Authority ;
- HR staff in charge;
- where applicable, appeals committee;
- Other EU institutions in the case of a transfer as personal files follow the staff member to the next institution.

13/ Retention policy of (categories of) personal data

Attestation file: 3 years (active retention) + 2 years (archives)
The attestation decisions are kept in the staff member personal file and have the same retention 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)

n/a

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,

Not envisaged

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):

Article 27.2.(b)
Processing operations intended to evaluate personal aspects relating to the data subject

Article 27(2)(b) describes as processing operations likely to present such risks: "*processing operations intended to evaluate personal aspects relating to the data subject, including his or her ability, efficiency and conduct*".

17/ Comments

PLACE AND DATE: Thessaloniki, 22 August 2012
DATA PROTECTION OFFICER: Spyros ANTONIOU (Data Protection Officer of Cedefop)
INSTITUTION OR BODY: CEDEFOP