

(To be filled out in the EDPS' office)

REGISTER NUMBER: 1181

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NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 04/11/2013

CASE NUMBER: 2013-1228

INSTITUTION: EASO

LEGAL BASIS: ARTICLE 27-5 OF THE REGULATION CE N° 45/2001⁽¹⁾

INFORMATION TO BE GIVEN²

1/ NAME AND ADDRESS OF THE CONTROLLER

Claus Folden
Head, Centre for Operational Support
EASO
MTC Block A
Winemaker's Wharf
Valletta Harbour
Malta MRS 1917

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

Centre for Operational Support (COS)

3/ NAME OF THE PROCESSING

Asylum Intervention Pool (AIP)

¹ OJ L 8, 12.01.2001.

² **Please attach all necessary backup documents**

4/ PURPOSE OR PURPOSES OF THE PROCESSING

Personal data is processed for the establishment of a pool of experts, the "Asylum Intervention Pool" (AIP). Experts from this pool may be selected by EASO for deployment in asylum support teams in member states.

EASO runs selection procedures for a particular profile of expert. National Contact Points (NCP's) from asylum authorities in member states nominate their experts with the relevant experience. Together with the nomination, NCP's attach CVs of experts. These CVs are incorporated into the AIP.

An excel spreadsheet with only the names of the experts/by profile is used by Centre for Operational Support (COS) staff members to manage the AIP.

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

The data subjects include experts in asylum processes from member states.

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

1) Experts' personal data included in their CVs:

Identification details: name, function, organisation, postal address, country of residence, business telephone number, mobile telephone number, fax number, e-mail address;

Information for evaluation of selection criteria:

=Basic qualifications: several years of work experience in the field of asylum; adequate knowledge of English as a working language

--Core competencies: expertise in at least one of the categories established by EASO Management Board Decision no 8/2012;

=Optional skills: useful for the composition of the asylum support team; and other personal data contained in CV s

2) A spreadsheet used to manage the AIP containing only the names of the experts and organised by profile.

3) Nominations of experts from NCPs, with the relevant CVs as attachments

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

EASO's specific privacy statement informs experts who wish to submit their CV for inclusion in the Asylum Intervention Pool about the processing of their personal data. This privacy statement is posted on EASO's website.

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

(Rights of access, to rectify, to block, to erase, to object)

The data subjects are informed of their rights via the specific privacy statement, available on the EASO website. Data subjects may access, update or correct their personal data by submitting a request in writing to the data controller, as stated in the privacy statement. Data subjects may update or correct their identification data at any time. However, to update or correct data demonstrating compliance with selection criteria, experts must re-submit their CV via their national contact point. Data subjects may ask to be removed from the AIP and their personal data to be erased, by submitting a request in writing to EASO via their national contact point.

9/ AUTOMATED / MANUAL PROCESSING OPERATION

The processing of personal data related to the Asylum Intervention Pool is mostly manual, with some automation in regard to the storage of electronic files.

All CVs are sent to EASO electronically and stored electronically. EASO staff evaluating CVs and managing the AIP is instructed to apply the greatest care, which includes applying the following principles:

- The files containing personal data are stored safely in folders with controlled access.
- The number of staff having access rights to the personal data is kept to a minimum.

10/ STORAGE MEDIA OF DATA

Electronic files are stored in COS' folder on the shared drive accessible only to the COS team.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

EASO Management Board Decision No.8 of 19.06.2012 on the profiles and overall number of experts to be made available for the Asylum Intervention Pool (AIP)

The lawfulness of the processing of personal data in the context of procurement procedure and contract management is based on Article 5(a) of the Regulation 45/2001.

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

1) CVs in the Asylum Intervention Pool: Head of Centre for Operational Support
Centre for Operational support staff involved in managing the AIP

2) AIP Experts' CVs and nominations:
Head of Centre for Operational Support
Centre for Operational support staff involved in managing the AIP Legal Adviser
Executive Director

3) AIP spreadsheet:
Head of Centre for Operational Support
Centre for Operational support staff involved in managing the AIP

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

The AIP is updated on a yearly basis when NCPs submit corrections/deletions to their list of available experts.

Once experts are no longer available for deployment, as notified by their NCP, their CV is removed from the AIP. CVs may also be removed from the AIP upon request from the expert via their NCP.

- 1) CVs sent to support nominations for a specific profile of expert to be deployed are kept for 2 years following the decision on the nomination of experts, to satisfy audit purposes.
- 2) The AIP spreadsheet is maintained and updated until the AIP no longer exists

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS

Data subjects can exercise their rights by contacting the data controller. Justified requests for blocking and erasure shall be handled without delay

(Please, specify the time limits for every category, if applicable)

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 applicable

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

Not applicable

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.(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

PLACE AND DATE: MALTA, 22/10/2013

DATA PROTECTION OFFICER: PAULA MELLO MCCLURE

INSTITUTION OR BODY: EASO