



EUROPEAN DATA PROTECTION SUPERVISOR

## *MANAGEMENT OF TRAINEESHIPS*

### **DATA PROTECTION NOTICE**

The EDPS organises biannual traineeships with a view to offer recent university graduates the opportunity to put into practice the knowledge acquired during their studies, particularly in their specific areas of competence such as law (preferably graduates with a data protection background), information and technology, information and communication, and human resources.

As such, the EDPS processes personal data in order to select and recruit trainees for the EDPS Secretariat and the EDPB Secretariat. The traineeship sessions start on 1 October and 1 March and run for a five-month period. The unpaid traineeship session can start anytime during the year.

Your personal data is processed in accordance with [Regulation \(EU\) 2018/1725](#) (hereinafter 'the Regulation').

We provide you with the information that follows based on Articles 15 and 16 of the Regulation.

#### **Who is the controller?**

The **controller** is the **European Data Protection Supervisor (EDPS)**. For more information on the EDPS please consult our website: <https://edps.europa.eu>.

Postal address: Rue Wiertz 60, B-1047 Brussels  
Office address: Rue Montoyer 30, B-1000 Brussels  
Telephone: +32 2 283 19 00  
Email: [edps@edps.europa.eu](mailto:edps@edps.europa.eu)

Responsible department or role:  
Human Resources, Budget, Administration (HRBA) Unit  
Contact us: [Stage@edps.europa.eu](mailto:Stage@edps.europa.eu)

Contact form for enquiries on processing of personal data to be preferably used:  
<https://edps.europa.eu/node/759>

The EDPS concluded a Service Level Agreement with the European Commission (EC) - DG EAC for the selection of trainees. In this process, the Traineeship Office (TO) of the EC acts as a joint controller for this processing activity.

The TO manages a website providing information and enabling candidates to apply for a

Virtual Blue Book (VBB) traineeship ([https://ec.europa.eu/stages/home\\_en](https://ec.europa.eu/stages/home_en)) and then registers the EDPS selected candidate in the VBB. Please consult the relevant EC record - [EC-01746](#) - for more information.

The EDPS and the EC are joint controllers only in the context of the VBB traineeships. For unpaid traineeships, the EDPS is sole controller.

**What personal data do we process and who has access to this personal data?**

Personal data of applicants for a VBB traineeship are stored in the VBB database and is under the sole responsibility of the EC's TO.

Only candidates included in the VBB can be recruited by the EDPS for the VBB programme. Data processing by the EDPS concerns only the selection from VBB and the management of recruited trainee personal files during their traineeship.

Personal data of applicants for an unpaid traineeship are stored by the EDPS.

The following **categories of personal data** are processed for the VBB programme and unpaid traineeships:

- Personal data allowing to identify and contact the candidate: surname, first name, date and place of birth, phone number, postal and email address, photo
- Access to the personal data provided by the applicant in his/her VBB profile: information regarding the eligibility requirements, CV, and the aforementioned contact details, as well as gender and nationality
- Special categories of personal data:
  - information about special health needs, if applicable, might be provided/requested in order to facilitate the access of the trainee to the EDPS premises and adapt the working space
  - medical certificates to justify any absence of the trainee are collected by the EDPS traineeship Coordinator during the period of traineeship
- Personal data included in the confidentiality undertaking that is signed by the newly recruited trainee
- Evaluation report of the trainees at the end of the traineeship period.
- Where applicable, correspondence attesting early termination of the traineeship.

The EDPS is in charge of creating the trainees' SYSPER profile/career when selected. To this regard, EDPS staff will have access to the trainees' surname, first name, nationality, date of birth and place of birth.

In addition, the EDPS will request each trainee for their ID or passport number, their phone number and will communicate this information to the European Parliament (EP) so that a badge can be issued. Personal data will also be communicated to the EP IT service in order to provide access rights and create an IT profile.

The following EU staff members will have access to personal data on a need-to-know basis:

- the EDPS Secretary-General
- Authorised EDPS staff in charge of trainees and administration of the Human Resources Unit

- Head of Unit or Head of Sector, the EDPS' and/or EDPB's staff members appointed for trainee's selection
- Authorised staff of DG EAC of the EC for different information on the training (such as, assessment of the trainee, duration of the training)
- Authorised staff of DG ITEC in the EP service in order to provide access rights and create an IT profile of the trainee
- Authorised staff of EP Security service in order to establish accreditation for the trainee

The EC' Internal Audit Service, the European Ombudsman, the Court of Justice of the EU, the Anti-Fraud Office of the EC, the Court of Auditors of the EU, the EDPS, in the framework of their duties, might have access to personal data. This is without prejudice to the provisions of the Regulation (EC) 1049/2001 regarding public access to documents.

### **Where did we get your personal data?**

Personal data are collected from yourself as candidate (via the Bluebook tool). Personal data of unpaid traineeships are collected from candidates' spontaneous applications.

### **Why do we process your personal data and under what legal basis?**

Personal data are processed with a view to selecting potential trainees for the EDPS Secretariat and the EDPB Secretariat, from the candidates included in the VBB or in case of unpaid traineeships from spontaneous applications. This allows the EDPS to evaluate and select candidates as well as recruit the trainees and to manage their file during the traineeship in the institution.

For general info on selection and recruitment at the EDPS:

[https://edps.europa.eu/careers\\_en](https://edps.europa.eu/careers_en).

The lawfulness of this processing activity is based on Article 5(1)(a) of the Regulation (*'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body'*). Recital 22, second sentence applies too.

The legal basis of the procedure is:

- the Staff Regulations (and particularly Art. 27-34) and the Conditions of Employment of Other Servants of the EU (particularly Art. 12-15);
- The EDPS Decision concerning the provisions relating to the traineeships programme of 20/12/2019.
- The Service Level Agreement between the EDPS and DG EAC.

### **How long do we keep your personal data?**

The time limits for storing the data are the following for the VBB programme:

- 2 months starting at beginning of a session for the non-recruited candidate (this is only stored in the VBB tool; the EDPS does not store any data on non recruited trainees);
- 2 years after the termination of the employment for recruited candidate, excepted data related to travel allowances for interviews which are kept for discharging the budget (7 years);

- Data necessary to issue a copy of the traineeship certificate (name, surname, birth date, e-mail address, dates of the traineeship, organisation where the internship took place and the amount of the grant) are kept for 50 years by DG EAC;
- Special categories of personal data will be kept until the end of the traineeship;
- Medical certificates (containing the following categories of personal data: name, last name, length of absence) are uploaded by trainees in their Blue Book account. The uploaded certificates are automatically sent from the system to the EDPS traineeship coordinator via email; the absence is encoded in SYSPER and the copy received by the EDPS is deleted from EDPS records.

The time limits for storing the data are the following for unpaid traineeships:

- 6 months after the submission of spontaneous application;
- 2 years after the termination of the employment for recruited candidate;
- Data necessary to issue a copy of the traineeship certificate (name, surname, birth date, e-mail address, dates of the traineeship) are kept for 10 years after the termination of the traineeship
- Medical certificates (containing the following categories of personal data: name, last name, length of absence) are received from the unpaid trainee by email and accessed only by the Traineeship Coordinator. The absence is encoded in SYSPER and the copy received is deleted from EDPS records.

### **What are your rights regarding your personal data?**

You have the right of access to your personal data and to relevant information concerning how we use it. You have the right to rectify your personal data. You have the right to ask that we delete your personal data or restrict its use.

Please note that in certain cases, as provided in Article 25 of the Regulation (EU) 2018/1725, restrictions of data subjects' rights may apply.

We will consider your request, take a decision and communicate it to you. The time limit for treating your request is one (1) month. This period may be extended by two (2) further months where necessary, taking into account the complexity and the number of the requests. In those cases, the EDPS will inform you of the extension within one (1) month of receipt of your request and will provide reasons for the delay.

You can send your request to the EDPS via our contact form on the EDPS website or by post in a sealed envelope (see section on contact details below).

### **You have the right to lodge a complaint**

If you have any remarks or complaints regarding the way we process your personal data, we invite you to contact the EDPS DPO (see section on contact details below).

You have, in any case, the right to lodge a complaint with the EDPS as a supervisory authority: [https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en](https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en).

### **Contact details for enquiries regarding your personal data**

We encourage you to contact us using the EDPS contact form, selecting 'My personal data' as the relevant subject: <https://edps.europa.eu/node/759>.

If you wish to contact the EDPS DPO personally, you can send an e-mail to [DPO@edps.europa.eu](mailto:DPO@edps.europa.eu) or a letter to the EDPS postal address marked for the attention of

the EDPS DPO.

EDPS postal address: European Data Protection Supervisor, Rue Wiertz 60, B-1047  
Brussels, Belgium

You can also find contact information on the EDPS website:  
[https://edps.europa.eu/about-edps/contact\\_en](https://edps.europa.eu/about-edps/contact_en).