

EDPS record of processing activity

Nr.	Item	Description
		Traineeship management EDPS Secretariat and EDPB Secretariat
1.	Last update of this record	14/08/2023
2.	Reference number	73
		<i>Part 1 - Article 31 Record</i>
3.	Name and contact details of controller	<p>European Data Protection Supervisor (EDPS) 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</p> <p>Responsible department or role: Human Resources, Budget, Administration (HRBA) Unit, Contact us: stage@edps.europa.eu</p> <p>Contact form for enquiries on processing of personal data to be preferably used: https://edps.europa.eu/node/759</p>
4.	Name and contact details of DPO	DPO@edps.europa.eu
5.	Name and contact details of joint controller (where applicable)	<p>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.</p> <p>The TO manages a website providing information and enabling candidates to apply for a Virtual Blue Book (VBB)¹ traineeship (https://ec.europa.eu/stages/home_en) and then registers the</p>

¹ The VBB is covered by a separate Record of the European Commission DPR-EC-01746.2 and the corresponding privacy statement. <https://ec.europa.eu/dpo-register/detail/DPR-EC-01746>

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		<p>EDPS selected candidate in the VBB. Please consult the relevant EC record - EC-01746 - for more information.</p> <p>The EDPS and the EC are joint controllers only in the context of the VBB traineeships. For unpaid traineeships, the EDPS is sole controller.</p>
6.	Name and contact details of processor (where applicable)	n/a
7.	Very short description and purpose of the processing	<p>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.</p>
8.	Description of categories of persons whose data the EDPS processes and list of data categories	<p>Personal data of applicants for a VBB traineeship are stored in the VVB database and is under the sole responsibility of the EC's TO.</p> <p>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.</p> <p>Personal data of applicants for an unpaid traineeship are stored by the EDPS.</p> <p>The following categories of personal data are processed in the context of the VBB programme and unpaid traineeships:</p> <ul style="list-style-type: none"> • Personal data allowing to identify and contact the candidate: surname, first name, date and place of birth, phone number, postal and email address, photo



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		<ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> ▪ 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. <p>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.</p> <p>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.</p>
9.	Time limit for keeping the data	<p>The time limits for storing the data of Blue Book trainees are the following:</p> <ul style="list-style-type: none"> • 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);



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		<ul style="list-style-type: none"> • 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. <p>The time limits for storing the data are the following for unpaid traineeships:</p> <ul style="list-style-type: none"> • 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.
10.	Recipients of the data	<ul style="list-style-type: none"> • 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



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		to the provisions of the Regulation (EC) 1049/2001 regarding public access to documents
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No
12.	General description of security measures, where possible.	Information security measures applicable to the Virtual Blue Book application as well as the security measures provided for in the EDPS Information Security Policy. Strict need to know principle applies.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	https://edps.europa.eu/system/files/2023-08/73 - edps_data_protection_notice - traineeship_management_14.08.2023.pdf

