

NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 29 AUGUST 2005

CASE NUMBER: 2005/215

NOTIFICATION OF: COMMITTEE OF THE REGIONS

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

INFORMATION TO BE GIVEN²

1/ NAME AND ADDRESS OF THE CONTROLLER

KYRIAKOS TSIRIMIAGOS, Head of Personnel Unit (Controller)

TOM HAENEBALCKE, Administrator (Delegated Controller)

**Committee of the Regions
99-101 Rue Belliard
B – 1040 Brussels**

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

**Committee of the Regions
Directorate for Administration
Staff Unit**

3/ NAME OF THE PROCESSING

Management of spontaneous applications for a non-paid internship (study period) at the Committee of the Regions.

¹ OJ L 8, 12.01.2001.

² **Please attach all necessary backup documents**

Short description of the processing:

Each year the Committee of the Regions (CoR) receives a significant number of applications for a short (non-paid) study period, a limited number of which can be granted. The professional and personal data collected in this framework are stored in a central database, used both for administrative management of the applications and for the evaluation and analysis thereof.

The processing in this framework implies operations such as collecting, storing, consulting, distributing and ensuring the administrative follow-up of data.

4/ PURPOSE OR PURPOSES OF THE PROCESSING

Managing the applications administratively (confirming receipt of the application, informing applicants of the outcome of their application, etc.) facilitating the evaluation and analysis of the requests.

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

Any person applying for a non-paid study period at the CoR.

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

The data collected in the framework of an application for a study period concern personal data (name, first name, gender, nationality, date and place of birth), contact data (e-mail address, address, telephone nr), academic and/or professional credentials (completed and/or ongoing studies, previous employment and/or traineeship experience) and other relevant information (language skills, IT skills, etc.).

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

Applicants will be informed of their rights regarding the personal data processed in the framework of the CoR's internship programme by way of a specific privacy statement on the CoR Internet website (purpose and nature of the processing, the right to access and to rectify information concerning them, time limits for storing data, etc.), published along with further general and procedural information regarding internships at the CoR.

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

See above.

9/ AUTOMATED / MANUAL PROCESSING OPERATION

Applications and supporting documents (notably CV's) are transmitted in paper format, and the processing of data is mainly being organised manually.

10/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

Legal basis of the processing operation:

Decision 163/97 of 16 October 1997, governing un-paid study periods at the Committee of the Regions of the European Union.

Lawfulness of the processing operation:

All personal data are provided directly by the applicants themselves. The information is being used solely and exclusively for evaluating and analysing the requests for a non-paid study period at the Committee, including the involved administrative follow up. It will not be used for any other purposes. All personal data requested from the data subjects in this framework are necessary and/or relevant in order to ensure a correct, efficient and lawful evaluation and analysis. Thus, the processing is necessary for the management and functioning of the institution.

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

The personal data compiled in this framework are disclosed solely and exclusively to the members of staff in charge of the CoR Traineeship Office.

The main elements of the applications (academic and/or professional background of the applicant, linguistic profile, requested timeframe, etc.) are made available to all CoR services concerned, albeit in an anonymous format, allowing the latter to verify whether any of the requests fits their needs.

When appropriate, and insofar a unit expresses a sincere interest in one of the profiles thus on offer, the Traineeship Office may disclose further personal data regarding the concerned applicant to the internship advisors of the interested unit.

The personal data obtained will not be divulged to any third parties, unless insofar this would be necessary for the purposes indicated above. Under no circumstances will the personal data be divulged for direct marketing purposes.

12/ GENERAL INDICATION OF THE TIME LIMITS

FOR BLOCKING: -----

AND/OR

FOR ERASING: -----

OF THE DIFFERENT CATEGORIES OF DATA (*Please, specify the time limits for every category, if applicable*)

All personal data are delivered directly by the applicants. Applicants may at any time contact the CoR Traineeship Office to verify the accuracy of the data.

Where appropriate, applicants can request the Traineeship Office to rectify any inaccurate or incomplete information. The Traineeship Office will make the requested modifications as soon as possible, and in any case no later than two weeks after the request.

i) Data regarding applicants for a study period

Personal data compiled regarding applicants for a study period at the CoR will be actively processed only for the time necessary to fulfil the processing purposes indicated above.

The data gathered in this framework will be passively stored in a database until the end of the year following the year to which the application relates, albeit for administrative (i.e. correspondence with applicants) and statistical purposes only. Beyond that timeframe, data will be maintained in the database in an anonymous format, for statistical purposes only.

Paper documents received from the applicants for a study period will be stored until the end of the year following the year to which the application relates, after what they will be destroyed.

(ii) Data regarding persons recruited for a study period

The personal data concerning persons effectively recruited for a study period will be kept in the Traineeship Office's archives until the end of the year following the year during which the study period was completed. They will be stored in the Staff Unit's archives thereafter, for historical and/or statistical purposes only.

13/ 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.

In order to keep record of all beneficiaries of a study period at the CoR and to allow the delivery of internship certifications upon request, the Traineeship Office will only maintain the following data regarding persons recruited for a study period (and related directly to the study period) in a separate file: name, first name and nationality of the trainee; start and end date of the study period; unit and internship advisor.

All other personal data will be treated as indicated under point 12.

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

Not applicable.

15/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING (*Please describe*):

AS FORESEEN IN:

ġ Article 27.2.(a)

Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,

Not applicable.

ġ Article 27.2.(b)

Processing operations intended to evaluate personal aspects relating to the data subject,

On the basis of an analysis of the personal data collected in this context (in particular academic and professional credentials and language skills); the data subject's aptitude and suitability for a study period at the Committee of the Regions will be evaluated.

ġ Article 27.2.(c)

Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

Not applicable.

ġ Article 27.2.(d)

Processing operations for the purpose of excluding individuals from a right, benefit or contract,

Not applicable.

ġ Other (general concept in Article 27.1)

16/ COMMENTS

None.

PLACE AND DATE: Brussels, 24 August 2005

DATA PROTECTION OFFICER: Petra Karlsson

INSTITUTION OR BODY: Committee of the Regions