



EUROPEAN COMMISSION

## **PROTECTION OF YOUR PERSONAL DATA**

**This privacy statement provides information about the processing and the protection of your personal data.**

**Processing operation:** *Management of STAGES in the European Commission, Agencies and Executive bodies having signed a Service Level Agreement (SLA).*

**Data Controller:** *Traineeships Office (Unit HR.B.4)*

**Record reference:** *DPR-EC-23928.1*

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## **1. Introduction**

The European Commission (hereafter ‘the Commission’) is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001) (“EUDPR”).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation “Management of traineeships in the European Commission, Agencies and Executive bodies having signed a Service Level Agreement (SLA)” undertaken by the Traineeships Office of the European Commission (Unit HR.B.4) is presented below.

## **2. Why and how do we process your personal data?**

Purpose of the processing operation: The European Commission Traineeships Office collects and uses your personal information for the following purposes:

- Identify all applicants for traineeships to the European Commission, agencies and bodies participating in the programme through a Service Level Agreement;
- Support the trainee selection procedures;
- Support the procedures related to the administrative management of trainees (recruitment, conduct of the traineeship, definition of individual rights, assignment to posts);
- Prepare the IT and technical environment corresponding to the trainee's responsibilities in his/her department;
- Assign access rights to the buildings and IT systems of the Commission and its agencies/services, in accordance with the requirements of the traineeship;
- Support the financial management procedures and payments of trainees;
- Insure trainees and possibly their spouses and children for the duration of the traineeship;
- Establish support measures in case of disability and/or health problems;
- Launch periodic evaluations aimed at determining the effectiveness, efficiency, usefulness, and impact of traineeships as well as application, pre-selection, and selection procedures;
- Invite candidates/trainees to events involving them and, if necessary, to fulfil all administrative requirements for their access and participation

*Invitations can be sent to their professional or private addresses. Private addresses can only be used in the following cases: before or after the traineeship, when candidates do not have trainee status, and during the traineeship, only to Blue Book (BB) trainees who do not have a professional email address. In the case of messages sent to several recipients, the e-mail addresses must be in BCC.*

- Issue course certificates, attestations, and tax returns/career reconstruction forms;

- Promote the diversity and accessibility of the traineeship programme - this includes anonymous statistical data, photos/videos taken during the traineeship and voluntary testimonials from trainees from past sessions;
- Establish contact for business continuity purposes and/or in the event of evacuation exercises.

Your data will be used for automated decision-making. During the pre-selection phase, each application for the traineeship programme is automatically (1) assessed to verify whether the applicant meets the eligibility criteria based on replies to series of questions (“eligibility check”) and (2) scored based on the information provided regarding educational degrees, domains of studies, duration of work experiences in home country and/or internationally, and language knowledge levels (“scoring”). In case of ineligibility, a member of the Traineeships Office always verifies that the decision reached is correct.

Solely automated decision making is involved during the scoring phase. The lawful ground to rely on solely automated decision-making for parts of the processing is “necessary for entering into, or performance of, a contract between the data subject and the controller” (Article 24(2)(a) EUDPR). Given the high volume of applications to the traineeship programme of the Commission, automated decision-making is necessary to sift through all applications with the intention of entering a direct contract between the data subject and the controller. The scores are based on fixed point values assigned to various criteria determined by the Traineeships Office before each session. The scoring criteria are fixed, objective and apply to all candidates in the same manner. Every session, the Traineeships Office defines how many candidates for each EU nationality (“national guiding rate”) should pass the pre-selection. The eligible applications are ranked by their score and applicants who fall below the threshold for their nationality based on their score are not invited to the next selection phase. Suitable measures are in place to safeguard the data subject’s rights and freedoms and legitimate interests (see Heading 8 below).

### **3. On what legal ground(s) do we process your personal data**

We process your personal data for the following reasons:

- the 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 (Article 5(1)(a) EUDPR);
- the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 5(1)(d) EUDPR).

The basis for the processing of your personal data under Article 5(1)(a) EUDPR is laid down in [Commission Decision of 2 March 2005](#) on rules governing the official traineeship programme of the European Commission (C(2005)458).

We will only process photos, videos and testimonials obtained based on your consent.

At the request of candidates concerned, the Traineeships Office may collect data concerning your health, i.e. information concerning disability and/or health problems of candidates, in order to provide for the necessary supporting measures. The Traineeship Office may also process certificates required to justify absence of more than 3 days. We process such special categories of personal data indicated in Section 4, because:

- the processing is necessary for the purposes of fulfilling the obligations and exercising the rights of the controller or the data subject in matters of employment law, social security, and social protection (Article 10(2)(b) EUDPR).

#### **4. Which personal data do we collect and further process?**

In order to carry out this processing operation, the Traineeships Office collects the following categories of personal data:

During the pre-selection/selection procedure, the application form filled in online by applicants includes the following information:

- Basic personal information (surname, first names, gender, nationality, date, place, and country of birth);
- Information on higher education, professional experience, international mobility, knowledge of languages, any studies or publications and computer and office skills;
- Information on motivations and preferences regarding the type of internship and the field of activity;
- Contact details (telephone number and e-mail address, name, address, and telephone number of the person to contact in case of emergency, address during the traineeship period, EU Login).

In addition, the Traineeships Office collects the following documents uploaded by shortlisted applicants to prove their eligibility:

- Copy of passport or identity card;
- Copy and, if applicable, translation of diplomas and studies declared in the application form;
- Proof of declared language skills (copy of diplomas, certificates);
- Proof of declared professional experience or international mobility (certificates from employers);
- If applicable, additional curriculum vitae and/or letters of reference concerning the applicant.

If necessary, the following additional personal information may be collected:

- Legal entity form and financial identification form;
- Address and telephone number of the person to be contacted in case of emergency, address during the internship period;
- Third party file and, if applicable, receipts for travel expenses;
- Electronic photo (for production of access card);
- First name, surname, and date of birth of spouse and each child, so that they can be covered by the Commission's health insurance scheme;
- Copy of their insurance, if they choose to keep it;
- Where applicable, for selected candidates to enable them to assert their rights and take any supporting measures that may be necessary, possibly information concerning disability and/or health problems and their dependants;
- Based on consent: testimonies, group or individual photos/videos; in this case you will be informed of your rights as well as of the details of the processing of these data (controller, purpose, duration of storage, rights.)
- In case of absence due to illness for more than 3 working days: certificates justifying the absence.

The provision of personal data is mandatory to fulfil a statutory requirement for participation in the European Commission official traineeship programme. If you do not provide your personal data, your application for traineeship programme cannot be considered.

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

The Traineeships Office only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for:

- Invalid applications (applications not submitted in the system) and data of applicants who are not selected: the data are kept for 2 years. After this period, all personal data of the applicants are anonymised and kept for statistical purposes.
- Successful candidates for traineeships: the following documents are kept for 5 years after the end of the traineeship period:
  - Candidate application form, including all annexes (copies of diplomas and certificates, copy of passport);
  - Evaluation and pre-selection form;
  - European Commission's offer of a traineeship;
  - Copy of the training certificate issued to the trainee at the end of the traineeship;
  - If applicable, correspondence attesting the early termination of the traineeship;
  - Proof of legal personality.
- The following documents are kept for 50 years after the end of the traineeship period:
  - Fiscal declarations containing information such as surname, first name, middle name, date of birth, period of traineeship, branch/department in which the trainee worked, and amount of grant received.

Those retention periods are aligned with the Common Commission-Level Retention List (third revision - SEC(2022)400).

Certificates justifying absence of more than 3 days are communicated to leave managers in the host departments and deleted from the Traineeships Office systems at the end of the traineeship session.

Trainees' photos, videos and testimonials obtained based on your consent are stored and may be used for a period of up to 5 years before being deleted. At any time, trainees have the right to request the deletion of this data from the Commission's servers and web pages and not to include it in future publications.

#### **6. How do we protect and safeguard your personal data?**

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the European Commission or of its contractors. All processing operations are carried out pursuant to the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' [Regulation \(EU\) 2016/679](#)).

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

## **7. Who has access to your personal data and to whom is it disclosed?**

Access to your personal data is provided to the Commission staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The origin of the data recipients:

- a) Within the EU organisation:
  - a. The Traineeships Office (for the management of the traineeship programme);
  - b. The Trainees Committee, a voluntary organisation of trainees who represent trainees and organise and coordinate their activities;
  - c. The Security Directorate (HR.DS) (for the issuance of badges);
  - d. Verifiers, Recruiters, HR Correspondents at the level of the DGs, services of DG HR (for the pre-selection, selection, and recruitment phases);
  - e. Advisors/supervisors designated by HR services for each trainee for the duration of their traineeship;
  - f. HR Correspondents in the DGs and services of DG HR in accordance with their tasks and responsibilities during the traineeship;
  - g. The Paymasters Office (PMO) (for accident insurance);
  - h. The Offices for Infrastructure and Logistics in Brussels and Luxembourg (OIB/OIL) (for office allocation, where relevant);
  - i. Commission IT services (DIGIT) (for IT onboarding, corporate laptops configuration, relevant access to information, intervention in case of technical issues);
  - j. DG BUDG and services involved in payments and other financial transactions have access to financial data.
- b) Outside the EU organisation:
  - a. External processors: Inasoft / KioskEmploi (platform manager of the Gestmax application and assessment platform);
  - b. Allianz - AWP Health & Life SA Contact (for health insurance / accident insurance);
  - c. Other institutions and agencies with a Service Level Agreement (SLA) (for selection and recruitment of trainees in their entity).
  - d. Traineeship offices of other institutions without SLA.

Your personal data may be disclosed, upon request, for audit purposes (e.g. to the Internal Audit Service, European Anti-Fraud Office (OLAF), the Court of Auditors, etc).

Trainees' work emails are published during the traineeship period in the Outlook address book of the European institutions and should be used exclusively for professional reasons.

## **8. What are your rights and how can you exercise them?**

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

Your data will be used for automated decision-making during the pre-selection phase where each application gets automatically scored for educational degrees, domains of studies, duration of work experiences in home country and/or internationally, and language knowledge levels. If your scored application falls below the threshold for your nationality (national guiding rate), you have the right to obtain human intervention on the part of the controller, to express your point of view and to contest the decision made. More specifically, you have the possibility to appeal the decision made by sending your request for appeal to the email address provided in the notification about your results. The Traineeships Office will then manually check how your application was scored and recalculate to verify if there was any mistake. In case of mistakes, the Traineeships Office has the possibility to include you back in the pool for the pre-selection phase.

If you have consented to provide your personal data to the European Commission Traineeships Office for the processing of testimonies, group or individual photos/videos, you can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

## **9. Contact information**

### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller: [ec-traineeships-office@ec.europa.eu](mailto:ec-traineeships-office@ec.europa.eu).

### **- The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer ([DATA-PROTECTION-OFFICER@ec.europa.eu](mailto:DATA-PROTECTION-OFFICER@ec.europa.eu)) about issues related to the processing of your personal data under Regulation (EU) 2018/1725.

### **- The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) if you consider that your rights under Regulation

(EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

#### **10. Where to find more detailed information?**

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-11147.