



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: *European Commission/Traineeships Office*

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).

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 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
- Supporting the trainee selection procedures
- Supporting the procedures related to the administrative management of trainees (recruitment, conduct of the traineeship, definition of individual rights, assignment to posts)
- Preparing the IT and technical environment corresponding to the trainee's responsibilities in his/her department
- Assigning access rights to the buildings and IT systems of the Commission and its agencies/services, in accordance with the requirements of the internship
- Supporting the financial management procedures and payments of trainees
- Insuring trainees and possibly their spouses and children for the duration of the internship
- Establishing support measures in case of disability and/or health problems
- Launch periodic evaluations aimed at determining the effectiveness, efficiency, usefulness, and impact of internships as well as application, pre-selection, and selection procedures
- To 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.

- Issuing 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

- Establishing contact for business continuity purposes and/or in the event of evacuation exercises.

Your data will be used for an automated decision-making, when determining the eligibility of the submitted application for the traineeship programme of the European Commission.

The eligible applications are ranked by their score and, every session, the Traineeships Office defines how many candidates for each EU nationality should move to the documents checking phase.

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

We process your personal data for the following reasons:

(a) 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

(b) processing is necessary for compliance with a legal obligation to which the controller is subject

(c) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract

(d) the data subject has given consent to the processing of his or her personal data for one or more specific purposes

The processing operations are necessary for the fulfilment of the obligations laid down in the [Commission Decision of 2 March 2005 - C\(2005\)458](#) - on the provisions relating to the European Commission's official traineeship programme.

At the request of the candidates concerned only, the Traineeships Office may collect information concerning any disability and/or health problems in order to establish the necessary accompanying measures.

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 of [Regulation \(EU\) 2018/1725](#)].

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

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

The Traineeships Office collects information necessary for the pre-selection/selection procedure, defined by the Traineeships Office and published on the Commission's website.

The application form contains:

- 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 to this information entered online by applicants, the Traineeships Office collects 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 trainee candidates to enable them to assert their rights and take any accompanying measures that may be necessary, possible disability [in accordance with Art. 10.2.b] and dependants
- On the basis of consent: testimonies, group or individual photos/videos; in this case trainees will be informed of their 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 2 working days: medical certificates justifying the absence.

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

5. How long do we keep your personal data?

The Traineeships Office of the European Commission only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing.

- Invalid application data (duplicates, applications not submitted in the system) - data is deleted after the application submission deadline.
- Applicants who are not selected - data are kept for 2 years. After this period, all personal data of the applicants are deleted.
 - 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 to the early termination of the traineeship
- Proof of legal personality

The following documents are kept for 50 years after the end of the probationary period:

- Insurance career statements 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

Medical certificates justifying absence of more than 2 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 on the basis of consent - 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. This data will be stored and may be used for a period of up to 5 years and then destroyed.

Data shared with other EC services (DG HR, BUDG, PMO, DIGIT, OIB) in accordance with their tasks and responsibilities are stored in the IT tools of these services for the duration of the legally established retention periods provided for by the Financial Regulation and the Commission's common retention list.

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. Trainees Committee
 - b. HRS – EC Security Service (badges)
 - c. Evaluators, Recruiters, HRC, HR, Conseillers – EC Institutions / Agencies staff designated by HR services
 - d. PMO (accident insurance): PMO-ASSURANCES-RC@ec.europa.eu
 - e. Internal Audit Service
 - f. Commission IT services

- b) Outside the EU organisation:
 - a. Inasoft / KioskEmploi (platform manager of the Gestmax application and assessment platform)
 - b. Allianz - AWP Health & Life SA Contact (health insurance / accident insurance)
 - c. Agencies with a Service Level Agreement (SLA)

The data could be disclosed, upon request, for audit purposes (DG HR and IAS internal audit structure, OLAF, Court of Auditors).

During the traineeship, some personal data are shared with and processed by other EC services (DG HR, BUDG, PMO, DIGIT, OIB) and their subcontractors in accordance with their tasks and responsibilities.

All services having access to candidates'/trainees' data are obliged to include the restrictions on sharing personal data in their respective PNRs.

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

The recipient of the data depends mainly on the stages of the selection process:

- The Traineeships Office staff and the IT departments involved have access to all data throughout the process.
- Inasoft managing the GESTMAX platform (the application and evaluation platform) exclusively carries out the procedures required by the EC Traineeships Office.
- All eligible applicants: The pre-selection committee of applicants has access to electronic data of the online application form and supporting documents.
- Successful candidates (included in the VBB): The recruiting services of the European Commission, as well as the agencies and executive bodies having signed an SLA with the Commission have access to it. These services use this data to identify suitable candidates for the allocation of trainee places.

As regards external evaluation, the provisions of the Financial Regulation and its Implementing Rules make it compulsory to carry out an external evaluation of the traineeship activity every six years.

In addition, certain data may be communicated to the Security Office and other Commission departments, as well as to the agencies participating in the programme via a Service Level Agreement (SLA) and to the traineeship departments of the other Institutions.

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 when determining the eligibility of your application for the European Commission's traineeship programme.

In case of objection, your registration for the European Commission traineeship programme cannot be considered.

You have consented to provide your personal data to the European Commission Traineeships Office for the present processing operation. 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.

- The Data Protection Officer (DPO) of the Commission

You may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) with regard to 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) 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.