

# EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

1	Title of the processing activity	<b>Selection of permanent staff for the EEAS by internal competitions</b>
2	Update of the record (last modification date)	03/01/2024
3	Register reference number	3361
4	Identity and contact details of the Data Controller Joint Controller (if applicable) Data Processor (if applicable)	<p>European External Action Service Rond Point Schuman 9A, 1046 Brussels, Belgium</p> <p>Data Controller contact entity: EEAS Selection and Recruitment RM.BHR.3 Functional mailbox: <a href="mailto:selection-and-recruitment@eeas.europa.eu">selection-and-recruitment@eeas.europa.eu</a></p>
5	Identity and contact details of the Data Protection Officer	<p>EEAS Data Protection Officer (DPO): Emese Savoia-Keleti. SG.AFFGEN.DPO Functional Mailbox of the DPO: <a href="mailto:DATA-PROTECTION@eeas.europa.eu">DATA-PROTECTION@eeas.europa.eu</a></p>
6	Purpose of the processing activity	<p>Purpose(s)</p> <p>To organise internal competitions pursuant to Articles 29, 30 and Annex III of the Staff Regulations, as well as Article 82 of the Conditions of Employment of Other Servants of the European Union, in order to select staff with a view to their recruitment as officials by the European External Action Service. To manage the administrative aspects of registration and the successive stages of the competitions, to manage and monitor the use of the reserve lists.</p>

# EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

7	Legal basis and lawfulness	<p><b>Lawfulness</b></p> <p>The processing of the personal data is necessary for the performance of a task carried out by the European External Action Service in the public interest and in particular for the management and functioning of the EEAS [Article 5(1)(a) of Regulation (EU) 2018/1725] as referred to in Recital 22 thereof.</p> <p>The processing of the personal data is necessary for compliance with the obligation to employ staff based on fair competitions in the Staff Regulations (see below)[Article 5(1)(b) of Regulation (EU) 2018/1725].</p> <p>The processing of the personal data is based on the consent of the data subject [Article 5(1)(d) of Regulation (EU) 2018/1725].</p> <p>The reasons for the processing of special categories under Article 10(1) of Regulation (EU) 2018/1725, including health-related data on disabilities or special needs communicated to the Medical Service of the EEAS via the functional mailbox " DISABILITY-SUPPORT@eeas.europa.eu " as well as allowing access to SYSPER for the Selection Board and staff of RM.BHR.3 acting as secretariat of the Selection Board are pursuant to Article 10(2):</p> <ul style="list-style-type: none"> <li>- The data subject has given explicit consent to the processing of those personal data for one or more specified purposes</li> <li>- The processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the entity of the operational controller or of the data subject in the field of employment and social security .</li> </ul> <p>Legal references:</p> <p>Articles 29, 30 and Annex III of the Staff Regulations, as well as Article 82 of the Conditions of Employment of Other Servants of the European Union</p> <p>Council Decision of 26 July 2010 establishing the organisation and functioning of the EEAS (2010/427/EU) , OJ L 201, 3/8/2010, p. 30.</p>
8	Categories of individuals whose data is processed - Data subjects	<p>I.</p> <p>Staff members who register as candidates for the competitions</p> <p>II.</p> <p>Members of the Selection Board Members of the Selection Board Secretariat Markers Invigilators</p>
9	Categories of data - Data processed	<p>The data, including personal data, which may be processed for that purpose are the following:</p> <p>Personal data allowing identification of the candidates: first name(s), family name(s) currently used, staff number, date of birth, gender, citizenship(s), main language, type and number of identification document, copy of identification document with all personal data contained therein, national identification number, professional and alternative e-mail addresses, competition application number, secret identification number attributed for the purpose of anonymous marking of tests, eligibility number used for identification in the context of computer-based testing.</p> <p>Personal data required to check if the candidates meet the specific eligibility conditions (administrative status): administrative status, function group, and grade.</p> <p>Personal data of candidates required to enable contact and the practical organisation of tests: address, postcode, city, country, telephone number(s), languages of correspondence, languages of testing; data provided by candidates concerning special needs</p>

# EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

(in particular, indication of medical conditions and/or disability); data concerning family, social and professional relationships that might constitute conflict of interest.

Personal data of candidates required to allow evaluation in light of the eligibility and/or selection criteria fixed by the notice of competition, and to assess motivation: educational background, details of professional experience, expertise and technical skills, knowledge of languages. Results obtained by the candidates at the different stages of the competition, and data concerning the assessment of candidates' qualifications, skills and competencies (scores and comments of the selection board).

Recording of the online testing session (still pictures taken every few seconds by the webcam of the candidate's computer and notes taken by the invigilator (clearance of the environment, observations on candidates' actions during the session).

The processing activity concerns one or more of the following special categories of data

Data related to health considered as special categories of data in accordance with Article 10 of Regulation 2018/1725.

General description of the special categories of data being processed :

In the application form, candidates are asked to reply to the following question: Do you need special adjustments of the selection tests due to a disability or a medical condition? In the case of a positive reply, they are asked to provide data concerning their health, specifically the indication of their disability or medical condition due to which they request adjustments, and supporting documents.

Collection of such data is necessary to enable the EEAS to assess objectively and on a case by case basis the particular situation of each candidate, with a view to offering adequate accommodation measures for the tests which would enable candidates to test under the best circumstances possible, given their needs. The data concerning health provided by candidates covers several categories, including temporary medical condition, permanent medical condition, disability, pregnancy, breastfeeding.

Data relating to health provided by the candidates to substantiate a request for special accommodation are accessible only to the EEAS Medical Service via the Functional Mailbox " DISABILITY-SUPPORT@eeas.europa.eu ", providing to the Selection Board and its secretariat with a recommendation only on the special accommodation needed.

As indicated under Point 7, the reasons under Article 10(2) of Regulation (EU) 2018/1725 allowing the processing of the special categories of data are as follows:

The data subject has given explicit consent to the processing of those personal data for one or more specified purposes

Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the entity of the operational controller or of the data subject in the field of employment and social security.

# EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

10	Recipients of data – Access to data	<p>Selection and Recruitment Division, EEAS staff members acting as Selection Board members or its secretariat as well as markers for the tests undertaken by the candidates ( RM.BHR.3) assigned staff – Selection and Recruitment Division is acting as Secretariat of the internal competitions'</p> <p>Selection Boards, statutory assessors (examiners serving in an advisory capacity) in the sense of Article 3 of Annex III SR. : For the purpose of assessing candidates' eligibility and comparative merits, and for providing assistance to the selection boards, respectively.</p> <p>Digital Solutions dedicated staff on a need to know basis for technical issues related to the <a href="http://www.ic.eeas.europa.eu">www.ic.eeas.europa.eu</a> portal EU Courts and the EEAS Legal service, unit SG.AFFGEN.2 in case of an administrative request or complaint under Article 90 1 or 2 of the Staff Regulations, and/or a judicial action before the EU Courts.</p> <p>In addition, as specific services having access to the data in accordance with Regulation (EU) 2018/1725: OLAF, IDOC, and IAS - upon request, and limited to what is necessary for official investigations or for audit purposes.</p> <p>The data processor, TESTWE SaaS Solution, processes data in the context of test invigilation according to the recruitment procedure allowing to verify candidate's identity and working environment for full exam integrity, offering in addition, synchronous and asynchronous monitoring, live monitoring, video, audio as well as screen sharing in order to guarantee maximum remote exam security.</p>
11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	N/A
12	Time limit for keeping the data - Retention period	<p>The administrative time limit(s) for keeping the personal data per data category</p> <ol style="list-style-type: none"> <li>1. Data category Individual files of candidates eliminated from a given competition Retention period 2 years from the date on which the candidate is excluded from the competition</li> <li>2. Data category Individual files of candidates included on the reserve list of a given competition Retention period 2 years from the closure of the reserve list</li> <li>3. Data category Individual files of laureates candidates recruited by the EEAS Retention period 2 years from the closure of the reserve list</li> <li>4. Data category Background files documenting the organisation of competitions Retention period 10 years from the closure of the competition</li> <li>5. Data category Personal data of candidates provided in the framework of an application for a specific competition which was not validated in time Retention period 2 year from the closing date of the application period for the competition</li> <li>6. The digital data storage will respect the retention periods mentioned in the various cases above.</li> </ol> <p>Archiving shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of individuals. Reports and other material containing personal data are archived according to the -Domec policy.</p> <p>In case of an incident, event or enquiry by authorities, data subjects or other concerned individuals' personal data will be preserved as long as the legal claims arising from the investigations expire or any follow-up action is due. This includes pending cases, appeals and court judgments to allow for the exhaustion of all appeal and other channels of legal remedies. In any case, personal data will not be kept longer than 5 years after the judgment on the pending case is final.</p> <p>When appropriate, personal data contained in supporting documents should be deleted where possible, if that data is not necessary for audit, inspection or other control purposes.</p>

# EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

13	Data Storage	<p>Electronic</p> <p>Digital (Office documents such as Word, Excel, PowerPoint, Adobe PDF, Audio-visual/multimedia assets, Image files such as .JPEG, PNG) on the secure servers of the EEAS Databases of the applications described in point 6, including servers of the external contractors</p> <p>Eventual printed version of documentation for temporary use</p> <p>Description/additional information regarding the storage medium Candidates' personal data are processed through a combination of computed-based and manual processing.</p>
14	General description of security measures	<p>Specific measures</p> <ul style="list-style-type: none"> <li>- IT tool for applications</li> </ul> <p>The in-house web-based portal called <a href="http://www.ic.eeas.europa.eu">www.ic.eeas.europa.eu</a> offers secure authentication to all stakeholders via EU LOGIN authentication procedure, secure access to all stakeholders via role-based access rights within the portal, and ensures confidentiality of the Secure but Non-Classified (SNC) information collected by hosting the solution (Portal and data) in the on-premises EEAS data Center.</p> <ul style="list-style-type: none"> <li>- IT tool for online tests</li> </ul> <p>In addition to TESTWE SaS Solution, six sub-contracted solutions are part of the platform:</p> <ul style="list-style-type: none"> <li>- Amazon EMEA SARL (AWS) hosting services for storing data in France</li> <li>- SENGRIID solution for email management</li> <li>- TWILIO for assembling test pictures and sound flows</li> <li>- NETINO (Webhelp) for supervising pictures and sound flows monitoring</li> <li>- OnePilot for supervising video monitoring during tests</li> <li>- and SENTRY for technical error management</li> </ul> <p>Risks associated to these subcontracted solutions are assessed.</p> <p>Summary on overall measures to ensure Information Security: Data provided by candidates are stored in a secured database.</p>
15	Rights of individuals	<p>Data subjects have the right of access to their personal data and the right to correct any inaccurate or incomplete personal data. The right of rectification can only apply to factual data processed. Under certain conditions, data subjects have the right to ask the deletion of their personal data or restrict their use as well as to object at any time to the processing of their personal data on grounds relating to their particular situation.</p> <p>The EEAS will consider the request, take a decision and communicate it to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary. Data subjects are informed in the Privacy Statement that they can find more information in Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725. According to Article 6 of the Staff regulations, The proceedings of the Selection Board shall be secret.</p> <p>In specific cases, restrictions under Article 25 of the Regulation may apply. If data subjects have questions concerning the processing of their personal data, they may address them to the Data Controller via the functional mailbox:</p> <ul style="list-style-type: none"> <li>EEAS-IC-2023-AD6@eeas.europa.eu</li> <li>EEAS-IC-2023-AD9@eeas.europa.eu</li> <li>EEAS-IC-2023-AD10@eeas.europa.eu</li> <li>EEAS-IC-2023-AD12@eeas.europa.eu</li> <li>EEAS-IC-2023-AST2@eeas.europa.eu</li> <li>EEAS-IC-2023-SC2@eeas.europa.eu</li> </ul>

## EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

16	Information to data subjects	A specific Privacy Statement is available for data subjects on the intranet and on the main page of the in-house web-based portal called <a href="http://www.ic.eeas.europa.eu">www.ic.eeas.europa.eu</a> as well as on the page of the individual competitions. The Privacy Statement is also attached to related communication.
----	------------------------------	---