

EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF

SELECTION, RECRUITMENT AND ADMINISTRATIVE MANAGEMENT FOR JUNIOR PROFESSIONALS IN EU DELEGATIONS (JPDs)

1. INTRODUCTION

The protection of your personal data and privacy is of great importance to the European External Action Service (EEAS) and to the Delegations of the European Union. You have the right under EU law to be informed when your personal data is processed [collected, used, stored] as well as about the purpose and details of that processing.

When handling personal data, we respect the principles of the Charter of Fundamental Rights of the European Union, and in particular Article 8 on data protection. Your personal data are processed in accordance with Regulation (EU) 2018/1725 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, aligned with Regulation (EU) 2016/679, the General Data Protection Regulation. In this privacy statement you find information about how the EEAS and EU Delegations process your personal data and what rights you have as a data subject.

2. PURPOSE OF DATA PROCESSING: Why do we process your data?

The purpose of the processing operation is to process personal data of Junior Professionals in Delegations (JPDs) in relation to personnel selection procedures, establishment of rights, payment of allowances and other entitlements, as well as to various administrative matters.

If you apply for a post in the Delegation in one of the European Commission (EC) sections (for development policy, programme/project management, humanitarian affairs, etc.), this privacy statement describes the processing of your personal data for the purpose of administrative management during your posting, while you can find the privacy statement issued by the Commission describing the processing of your personal data related to the EC selection process below.

If you apply for a post in the Delegation in one of the EEAS sections (for political, press and information functions), this privacy statement describes the processing of your personal data both in the selection process and during your posting.

3. DATA PROCESSED: What data do we process?

Personal data submitted for the purposes of selection, establishment of rights, payment of allowances and other entitlements:

- Application forms
- Selection panel reports
- Traineeship Agreements between EEAS/COMMISSION and JPDs
- Financial Identification (bank details)
- Legal Entity (personal data, official address)
- Other materials related to JPDs traineeship (passport, university diplomas, language certificates, judicial record etc.)

Data collected include:

- name
- date and place of birth
- gender
- nationality
- marital status
- family composition
- official address
- emergency contact details, etc.

4. DATA CONTROLLER: Who is entrusted with processing your data?

The data controller determining the purpose and the means of the processing activity is the European External Action Service (EEAS). The EEAS Division responsible for managing the personal data processing under the supervision of the Head of Division is the following organisational entity:

EEAS Division “Career, Learning and Development” (RM.BHR.4)

For the selection of candidates for the EU Delegation sections coordinated by the European Commission, solely the EC is the Controller (see privacy statement below). The EC Unit responsible for managing the JPD selection is the following organisational entity:

EC Unit “HR for EU Delegations” (EC.HR.E.2)

5. RECIPIENTS OF THE PERSONAL DATA: Who has access to your data?

The recipients of the data may be the following, on a strict "need-to-know policy" basis:

- EEAS RM.BHR.4 Division “Career, Learning and Development” designated staff
- EC.HR.E.2 Unit “HR for EU Delegations” designated staff (for the JPD Commission selection, see below the relevant Privacy Statement)
- Heads of Division and possibly other dedicated staff in the division relevant for the particular recruitment
- Heads of Delegation and Head of Administration in EU Delegations - Co-controllers processing personal data (CVs and other material)
- Members of selection panels including representatives of Council, Commission and EEAS, Appointing Authority

Personal data not intended to be transferred to a third country or an international organisation. The given information will not be communicated to third parties, except where necessary for the purposes outlined above.

6. ACCESS, RECTIFICATION, ERASURE OF DATA: What rights do you have?

You have the right of access to your 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, you have the right to ask the deletion of your personal data or restrict their use as well as to object at any time to the processing of your personal data on grounds relating to your particular situation. We will consider your request, take a decision and communicate it to you. For more information, please see Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725. In specific cases, restrictions under Article 25 of the Regulation may apply.

If you have questions concerning the processing of your personal data, you may address them to the Data Controller via the functional mailbox:

JPD@eeas.europa.eu

Concerning the selection of Commission staff, the Data Controller can be contacted via the functional mailbox:

HR-DEL@ec.europa.eu

7. LEGAL BASIS: On what grounds we collect your data?

Lawfulness:

The processing of your personal data is necessary for the performance of a task carried out by the EEAS in the public interest, in particular for the management and functioning of the EEAS [Article 5(1)(a) of Regulation (EU) 1725/2018] as referred to in Recital 22 thereof.

Legal basis:

- Joint Decision of the Commission and the High Representative of the European Union for Foreign Affairs and Security Policy of 12.06.2012 establishing a High Level Traineeship Programme in the Delegations of the European Union and the Rules Governing this Programme in Partnership with the Member States of the European Union (JOIN(2012) 17 final)
- Decision of the Chief Operating Officer of the European External Action Service In agreement with the Directors-General of DG DEVCO and DG HR of the European Commission of 22/01/2014 on the Implementing Rules of the High Level Traineeship Programme in the Delegations of the European Union in Partnership with the Member States of the European Union (EEAS DEC(2014) 002)
- Further legal reference: 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.

8. TIME LIMIT - DATA STORING: For what period and how we process your data?

Retention:

The recruited applicants' data will be retained for a maximum of 10 years as of the termination of the traineeship following the European Data Protection Supervisor's Guidelines concerning the processing operations in the field of staff recruitment (link [here](#))

As for the non-recruited applicants, data will be retained for a maximum of 2 years. The data will be destroyed after the aforementioned period.

Security of data:

Appropriate organisational and technical measures are ensured according to Article 33 of Reg. (EU) 2018/1725. The collected personal data are stored on servers that abide by pertinent security rules. Data is processed by assigned staff members. Access to specific files requires authorisation. Measures are provided to prevent unauthorised entities from access, alteration, deletion, disclosure of data. General access to personal data is only possible to recipients with a UserID/Password. Physical copies of personal data are stored in a properly secured manner.

9. EEAS DATA PROTECTION OFFICER: Any questions to the DPO?

If you have enquiries you can also contact the EEAS Data Protection Officer at data-protection@eeas.europa.eu.

10. RECOURSE

You have, at any time, the right to have recourse to the European Data Protection Supervisor at edps@edps.europa.eu.

eDPO 1201, version 09/01/2023



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: *High level traineeship programme for Junior Professionals in EU Delegations (JPDs)*

Data Controller: *European Commission – HR.E.2*

Record reference: *DPR-EC-18308: High level traineeship programme for Junior Professionals in EU Delegations (JPDs)*

Table of Contents

1. Introduction
2. Why and how do we process your personal data?
3. On what legal ground(s) do we process your personal data?
4. Which personal data do we collect and further process?
5. How long do we keep your personal data?
6. How do we protect and safeguard your personal data?
7. Who has access to your personal data and to whom is it disclosed?
8. What are your rights and how can you exercise them?
9. Contact information
10. Where to find more detailed information?

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 the processing operation "High level traineeship programme for Junior Professionals in EU Delegations (JPDs)" undertaken by HR.E.2 is presented below.

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

The high level traineeship programme for JPDs aims to enable junior professionals from the Member States of the EU to gain first-hand experience in the work of the Delegations and a deeper insight into the Delegations' role in the implementation of EU external relations policies as well as to deepen their knowledge of the EU's institutional framework in this domain. The overall programme is managed by the EEAS. However, each institution remains fully in charge of its selection procedures.

HR.E.2 collects and uses your personal information for the purpose of implementing parts of the high level traineeship programme for JPDs that falls under its responsibility. The data collected by HR.E.2 is, therefore, used, in a first step, for the selection of candidates from the Member States who applied to Commission JPD postings, following the call for expression of interest published by the EEAS. Part of the data is used in a second step by HR.E.2 for the establishment of traineeship agreements, and extension to traineeship agreements where applicable, between the Commission and the selected candidates. Lastly, part of the personal data is used for the establishment of the evaluation reports to be produced during the traineeship.

The data submitted may also be used for extraction of anonymised statistics (for example: average number of candidates who have already worked in the EU institutions), which may serve for analysis and forward planning in the area of Human Resources Management in the Commission.

Your personal data will not be used for an automated decision-making including profiling.

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

We process your personal data because it 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) of Regulation (EU) 2018/1725). The Union laws that are the basis for such processing are the following:

- Joint Decision of the Commission and the High Representative of the European Union for Foreign Affairs and Security Policy of 12.06.2012 "establishing a High Level Traineeship Programme in the Delegations of the European Union and the Rules Governing this Programme in Partnership with the Member States of the European Union" (JOIN(2012)17);
- Decision of the Chief Operating Officer of the European External Action Service In agreement with the Directors-General of DG DEVCO and DG HR of the European Commission of 22/01/2014 "on the Implementing Rules of the High Level Traineeship Programme in the Delegations of the European Union in Partnership with the Member States of the European Union" (EEAS DEC(2014)002).

In addition, we may transmit your personal data included in the evaluation report established at the end of the traineeship to your Member State of origin, because you have given consent to this processing of your personal data (Article 5(1)(d) of Regulation (EU) 2018/1725) in line with Article 8.12 of Joint Decision JOIN(2012).

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

In order to carry out this processing operation, HR.E.2 collects the following categories of personal data, via the application forms and documents provided by the candidate in view of supporting their application and during the traineeship:

- name;
- date and place of birth;
- gender;

- nationality;
- marital status;
- family composition;
- official address;
- emergency contact details, etc.;
- financial identification (bank details);
- qualifications (university diplomas, language certificates, experience, etc.);
- personal data included in passports, judicial records, etc.;
- selection panel reports;
- traineeship agreements and their extensions (where applicable) between the Commission and JPDs;
- personal data included in the evaluation reports.

The provision of personal data is mandatory to meet the requirements of the Joint Decision JOIN(2012)17 establishing the traineeship programme. If you do not provide your personal data, your expression of interest will not be considered.

5. How long do we keep your personal data?

HR.E.2 only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing and reporting, namely:

JPDs selected for a posting in Delegation (signing a traineeship agreement)

- Data stored electronically by HR.E.2 (application documents, CVs and any supporting documents, copies of criminal records, evaluation reports, as well as tables in Excel format or equivalent, consolidating the results of the traineeship exercises), are kept for six years to enable adequate administrative management, including possible extensions of traineeship agreements and evaluation of the programme through questionnaires.

JPDs not selected for a posting in Delegation

- Data stored electronically by HR.E.2 are kept for 2 years after the closure of the selection procedure.

In case of appeals or judicial proceedings, the above-mentioned retention periods are extended to five years after the final administrative or judicial decision was rendered.

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 on the servers of the Commission. 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 Commission. In order to protect your personal data, the Commission has put in place a number of technical and organisational measures. Technical measures include the 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.

Additional technical and organisational measures relating to personal data stored in Sysper are described in DPR-EC-01230 available in the DPO Public register.

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 recipients of the data may be the following, on a strict "need-to-know policy" basis:

- Commission designated staff in Unit HR.E.2.
- Members of the selection panels organised in Commission headquarters.
- Heads of Delegation, hierarchical superiors of the JPD and Heads of Administration in Delegations (Heads of Delegation and Heads of Administration are EEAS personnel).
- Relevant Heads of Unit in the Commission and possibly other dedicated staff in the unit relevant for the particular traineeship agreement.
- HR Correspondents in the relevant Commission Directorate-Generals.
- Member State of origin of the JPD.

Member State of origin of the JPD may have access to the evaluation reports subject to the consent of the JPD and the EC as established in Article 8.12 of Joint Decision JOIN(2012)7 final of 12.06.2012.

Personal data are not intended to be transferred to a third country or an international organisation. The information we collect will not be given to any third party, except where necessary - for the purposes outlined above - to the relevant Heads of Delegation and Heads of Administration (EEAS), to the relevant Member State and for the purposes we may be required to do so by law.

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, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or 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).

If you have consented to the transmission of your personal data included in the evaluation report established at the end of the traineeship to your Member State of origin, 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, HR.E.2 HR-DEL@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 them. 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-18308*.