

# 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, Recruitment and Administrative Management of Junior Professionals in EU Delegations (JPDs)</b>
2	Update of the record (last modification date)	04/12/2020
3	Register reference number	1201
4	Identity and contact details of the Data Controller Joint Controller (if applicable) Data Processor (if applicable)	<p>Controller: European External Action Service (EEAS) R.P. Schuman 9/A, Brussels 1040, Belgium</p> <p>Contact team: EEAS BA.HR.2 SELECTION and RECRUITMENT SELECTION-AND-RECRUITMENT@EEAS.EUROPA.EU</p> <p>Data Protection Officer:  Emese Savoia-Keleti, SG.AFFGEN.DPO  DATA-PROTECTION@EEAS.EUROPA.EU</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: DATA-PROTECTION@eeas.europa.eu</p>

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6	Purpose of the processing activity	<p><b>Purpose</b> 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, and with regard to other administrative matters.</p> <p>The aim of the JPD programme is to enable highly motivated and qualified junior professionals from the Member States to gain experience in the work of different Delegations. The traineeship agreement has a fixed term of one year; with a possible renewal for a second year (depending on the budget availability by the EEAS, the Commission or the sponsoring Member State or EU institution or body). The total duration shall, under no circumstances, go beyond two consecutive years.</p> <p><b>Description</b> Management of the programme includes preparation, selection and administrative management for JPDs posted in EU Delegations as follows:</p> <ul style="list-style-type: none"> <li>- Coordination of the recruitment process for JPDs in Delegations</li> <li>- Establishment of the rights of JPDs in Delegations</li> <li>- Operational and financial initiation and verification</li> <li>- Preparation and processing of the financial documents necessary for monthly payments of allowances</li> <li>- Payment of monthly allowances (grant, accommodation contribution and hardship contribution) via a dedicated IT tool (at present : Pay4SNE)</li> <li>- Payment of installation contribution, contribution towards the cost of the journey and contribution towards the cost of the insurance premium</li> <li>- Coordination with relevant services involved in the implementation of the programme</li> <li>- European Commission DG DEVCO, when appropriate</li> </ul>
7	Legal basis and lawfulness	<p><b>Lawfulness of processing:</b> The processing of personal data related to the selection and administrative management of Junior Professionals in Delegations (JPDs) is a task carried out in the public interest [Article 5(1)(a) of Regulation (EU) 2018/1725].</p> <p><b>Legal bases:</b></p> <ul style="list-style-type: none"> <li>- 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)</li> <li>- Joint Decision of 19.6.2017 modifying the above-mentioned Decision of 12.6.2012;</li> <li>- 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)</li> <li>- Decision of 21.6.2017 modifying the Implementing Rules above-mentioned of 22.1.2014</li> <li>- 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.</li> </ul>
8	Categories of individuals whose data is processed - Data subjects	<p>Data are processed from the following individuals or group of people:</p> <ul style="list-style-type: none"> <li>- Junior Professionals in EU Delegations (JPDs)</li> </ul>

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9	Categories of data - Data processed	<p>Data, including personal data, processed in the following documents submitted for the purposes of selection, establishment of rights, payment of allowances and other entitlements:</p> <ul style="list-style-type: none"> <li>- Application forms</li> <li>- Selection panel reports</li> <li>- Traineeship Agreements between EEAS/COMMISSION and JPDs</li> <li>- Financial Identification (bank details)</li> <li>- Legal Entity (personal data, official address)</li> <li>- Other materials related to JPDs traineeship (passport, university diplomas, language certificates, judicial record etc.)</li> </ul> <p>Data collected include:</p> <ul style="list-style-type: none"> <li>- name</li> <li>- date and place of birth</li> <li>- gender</li> <li>- nationality</li> <li>- marital status</li> <li>- family composition</li> <li>- official address</li> <li>- emergency contact details, etc.</li> </ul>
10	Recipients of data – Access to data	<p>The recipients of the data may be the following, on a strict need-to-know policy basis:</p> <ul style="list-style-type: none"> <li>- EEAS BA.HR.2 Division Selection and recruitment designated staff</li> <li>- Heads of Division and possibly other dedicated staff in the division relevant for the particular recruitment</li> <li>- Heads of Delegation and Head of Administration in EU Delegations – Co-controllers processing personal data (CVs and other material)</li> <li>- Members of selection panels including representatives of Council, European Commission and EEAS, Appointing Authority</li> </ul> <p>The given information will not be communicated to third parties, except where necessary for the purposes outlined above.</p>
11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	<p>Personal data not intended to be transferred to a third country or an international organisation.</p>
12	Time limit for keeping the data - Retention period	<p>The recruited applicants' data will be retained for a maximum of 10 years as of the termination of the traineeship . As for the non-recruited applicants, data will be retained for a maximum of 2 years. When appropriate, personal data contained in supporting documents should be deleted where possible when these data are not necessary for legitimate purposes, such as audit or other type of control.</p>

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13	Data Storage	<p>1</p> <p>.</p> <p>Electronic archives</p> <ul style="list-style-type: none"> <li>- Outlook: folders only accessible to staff members of EEAS BA.HR.2</li> <li>- Drive Group Share (drive 'Y'): selection related files are only accessible to staff members of EEAS BA.HR.2</li> <li>- SYSPER: personal data stored and only accessible to staff members of EEAS BA.HR.2 in charge of JPDs (EU Login identification)</li> <li>- Pay4SNE: personal data stored and only accessible to staff members of EEAS BA.HR.2 in charge of JPDs (EU Login identification)</li> <li>- ARES: only accessible to staff members involved with selection (EU Login identification)</li> </ul> <p>2. Paper archives: EEAS BA.HR.2 paper archives are in locked cupboards on BA.HR.2 premises or in Archives rooms.</p>
14	General description of security measures	<p>Appropriate organisational and technical measures are ensured according to Article 33 of Reg. (EU) 2018/1725.</p> <p>Security is also guaranteed by the safety measures built in the various IT applications. The collected personal data are stored on servers that abide by pertinent security rules. Data is processed by assigned staff members. Files have authorised access. 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 (EU Login Authentication).</p> <p>Physical files are locked in cupboards on the Division Selection and Recruitment premises or in Archives rooms.</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.</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:  <a href="mailto:selection-and-recruitment@eeas.europa.eu">selection-and-recruitment@eeas.europa.eu</a></p>
16	Information to data subjects	<p>A specific Privacy Statement – Data Protection Notice contains information provided to the Data Subject(s). The Privacy Statement is available on the internet/intranet. Administration Human Resources Junior Professionals in Delegations</p>

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