

DATA PROTECTION NOTICE Recruitment of Trainee(s)

1. Introduction

The European Union Agency for Asylum (hereinafter 'the EUAA' or 'the Agency') is committed to protecting your privacy. The EUAA collects and further processes personal data pursuant to <u>Regulation</u> (EU) 2018/1725¹ (hereinafter 'the EUDPR').

This Data Protection Notice explains *inter alia* the reasons for the processing of your personal data, the way we collect, handle and ensure protection of your personal data 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, as well as of the Data Protection Officer (DPO) and the European Data Protection Supervisor (EDPS) to which you may have recourse as well to exercise the said rights.

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

Your personal data are processed for the purpose of selecting and recruiting Trainee(s) through the traineeship programme of EUAA, as it was established by the Decision No 42/2023 of the Executive Director² laying down rules on governing the traineeship programme. Personal data are processed in the context of assessing candidates' applications, submitted through the EUAA online application system ('eRecruitment'), and their performance throughout the interview phase of the selection process.

Candidates can draft, complete, and submit their application(s) after a secure, password-protected account is created on EUAA's online application system (eRecruitment). Submitted applications are screened for their eligibility by the Human Resources Unit and then assessed by the interested EUAA Centres/Units. Most suitable candidates are invited to an on-line interview. Invitations to the above-mentioned phase are sent to candidates by e-mail. Upon communication by the EUAA Centre/Unit on the selected Trainee(s), the Human Resources Unit shall then initiate the process leading to the award of the traineeship.

As there may be large numbers of applications, only those candidates selected for an interview shall be notified and informed of the interview outcome.

Selected Trainee(s) shall be obliged to submit any forms, certificates, or other documents required by the Agency's Human Resources Unit prior to the start of the traineeship.

¹ 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39-98.

² Ref. number EUAA/EDD/2023/042



Trainee(s) shall be required to comply with the Agency's policy on the management of conflicts of interest³. In addition, Trainee(s) shall be required to sign a confidentiality declaration at the beginning of their traineeship.

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

The procedure for the EUAA Traineeship is administered by the Decision of the Executive Director laying down rules on governing the traineeship programme⁴.

Consequently, the relevant processing operation is lawful under Article 5(1) points (a) of the EUDPR given that 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 EUAA.

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

The following (categories of) personal data may be processed:

Screening phase

Personal data included in the application form submitted via the eRecruitment system:

- contact/identification details of the applicant, such as name, surname, postal address, telephone number, e-mail address, date of birth, gender, nationality;
- contact/identification details of the contact person of the Employer, such as name, surname, position covered, telephone number, e-mail address);
- personal data provided by the candidate to verify whether they fulfil the eligibility and selection criteria laid down in the Vacancy Notice, such as educational background, including knowledge of languages, training, work experience, other skills, references (name, surname, postal address, phone number, e-mail address, work relationship);
- personal data included in the publication(s) mentioned in the application;
- personal data included in the motivation section.

Interviewing phase

- A. Personal Data related to the appointed Mentor and/or Staff members working in the Hiring Sector/Unit/Centre:
 - Name, Surname, and job title are disclosed to those candidates who are invited to the interview;
 - Interviews are organised online and software tools (e.g., <u>Microsoft Outlook</u> and Microsoft <u>Teams</u>, or <u>Webex</u>) are used. Mentor and/or Staff members working in the Hiring Sector/Unit/Centre: email address is used when setting up an online interview.

³ Decision of the Executive Director No 13 of 27 January 2023 on the policy on the prevention and management of conflicts of interest, related post-employment and ethical guidance, and the role of ethics correspondent.

⁴ Ref. number EUAA/EDD/2023/042



B. Personal Data related to the candidates:

Interviews are organised online and software tools (e.g., <u>Microsoft Outlook</u> and Microsoft <u>Teams</u>, or <u>Webex</u>) are used. Candidates' e-mail address is used when setting up an online interview.

Onboarding phase

During onboarding, the following personal data related to candidates are collected:

- Copy of passport or identity card;
- Home address and private telephone number at the place of recruitment and of employment;
- Personal data contained in the supporting documentation serving as proof of any education/academic qualification mentioned in the application;
- Personal data contained in the supporting documentation serving as proof of active health insurance covering the trainee during the traineeship;
- Personal data contained in the supporting documentation to receive the disability allowance;
- Personal data contained in the Legal Entity form;
- Personal data contained in the Financial Identification form such as bank account details;
- Personal data contained in the reimbursement of travel and subsistence expenses form (if relevant).

Apart from the above, personal data may be contained in ad-hoc correspondence that candidate(s) may initiate with the Agency in case they have queries or request for clarifications.

5. How long do we keep your personal data?

Not shortlisted candidates: applications are kept for 1 year from the closing date for applications.

Shortlisted but unsuccessful candidates: applications are kept for 2 years from being informed about the outcome of the selection procedure.

Successful candidates: applications are kept for 5 years from the closing date for applications.

Recruited candidates: data collected in the field of recruitment should be stored in the trainee's personal file. The time limit for storing is 5 years from the end of the traineeship period worked by a recruited trainee.

6. Who has access to your personal data and to whom are they disclosed?

Your personal data may be disclosed to the following categories of recipients:

- Personnel in the Human Resources Unit (HRU) of the EUAA;
- Personnel in the Finance Unit;
- EUAA Staff acting as Mentors in the framework of the traineeship;
- Authorised staff of the PMO;
- Should your name be included in a pool of potential trainees, EUAA Heads of Centres/Units/Sectors may have access to your application upon request;
- The Executive Director of the EUAA;



 Duly authorised personnel from external service providers in case they provide consultancy and/or audit services to EUAA.

As regards the Mentor(s)' personal data, the recipients are the candidates invited for the interview.

On a need-to-know basis and in compliance with the relevant current legislation, bodies charged with monitoring or inspection tasks in application of EU law (e.g., the European Court of Justice, Court of Auditors, Internal Audit Service (IAS), European Anti-fraud Office (OLAF), the European Ombudsman, the European Data Protection Supervisor) may have access to your personal data.

7. How do we protect and safeguard your personal data?

Data are kept in electronic format. Files with confidential information are stored in secure folders of restricted access, in the internal document management system of the EUAA, i.e., ERDMS. In case hard copies are needed, they are stored under lock and key by the HRU of the Agency and are accessible only on a strict need-to-know basis. The EUAA has put in place a number of technical and organisational measures as required under Article 33 of the EUDPR. 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.

8. Do we transfer any of your personal data to third countries or international organisations (outside the EU/EEA)?

This processing activity does not entail any transfers of personal data to third countries or international organisations (outside the EU/EEA).

9. Does this processing involve automated decision-making, including profiling?

This processing activity does not involve automated decision-making, including profiling.

10. What are your rights and how can you exercise them?

According to the EUDPR, you are entitled to access your personal data and to rectify them in case the data are inaccurate or incomplete. If your personal data are no longer needed by the EUAA or if the processing operation is unlawful, you have the right to erase your data. Under certain circumstances, such as if you contest the accuracy of the processed data or if you are not sure if your data are lawfully processed, you may ask the Data Controller to restrict the data processing. You may also object, on compelling legitimate grounds, to the processing of data relating to you. Additionally, you have the right to data portability which allows you to obtain the data that the Data Controller holds on you and to transfer it from one Data Controller to another. Where relevant and technically feasible, the EUAA will do this work for you.

Should you have any queries/questions concerning the processing of your personal data or should you wish to exercise your rights, please contact the Data Controller, i.e., the Head of Human Resources Unit of the EUAA, by sending an e-mail to HRU.Secretariat@euaa.europa.eu.



You may always submit queries, remarks or complaints relating to the processing of your personal data to the Data Protection Officer (DPO) of the EUAA using the following e-mail address: dpo@euaa.europa.eu.

In case of conflict, complaints can be addressed to the European Data Protection Supervisor (EDPS) using the following e-mail address: supervision@edps.europa.eu.

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