



DATA PROTECTION NOTICE ERCEA Unit D.2 – “Human Resources” Blue Book Trainees

This notice concerns the processing operation called “**Blue Book Trainees**”. This processing requires the handling of personal data and is therefore subject to Regulation (EU) 2018/1725 (Data Protection Regulation)¹.

1. What personal information do we collect, from where and for what purpose?

1a) Personal data

The ERCEA collects and processes the following types of personal data during this processing operation²³:

- **Identification data and data on telephone numbers and communications:**
 - First name, middle name, surname, Blue Book candidate number, private e-mail address, private address and phone number, date and place of birth, gender, nationality.
- **Data concerning the data subject’s career, recruitment and contracts:**
 - CV, education, training, professional experience, language knowledge, publications, hard and soft skills, preferred department for the traineeship, motivation, traineeship period.
- **Data concerning the data subject’s family or contact person:**
 - Contact details of the person to be contacted in the event of an emergency (e.g. name, surname, phone number, address), marital (civil) status.
- **Data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct):**
 - In-service training report following the traineeship period.
- **Data concerning health, leave and absences:**
 - The ERCEA does not process any medical data of BBTs, but administrative data related to health (i.e. medical certificates);
 - Information about any physical constraint requiring special measures to carry out the work;
 - Annual or sickness leave.
- **Biometric data (signatures) and data concerning the physical characteristics of persons as well as the image, voice or fingerprints:**
 - Hand-written signatures on confidentiality declarations and leaving forms, CVs may contain a photograph.

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.

² Data subjects may spontaneously reveal further types of personal. However, the ERCEA does not actively request or collect data other than those listed in this Notice.

³ In case of force majeure situations, the ERCEA may in these exceptional circumstances process additional personal data about health, as may be necessary to ensure the safety and well-being of our staff. Please refer to the DPN on Business Continuity for further information.

1b) Purposes of the processing

The ERCEA processes personal data in order to evaluate the expertise and the suitability of pre-selected candidates in the Virtual Blue Book. Upon recruitment, the purpose of the processing operation is the everyday management of the traineeship.

The Controller may envisage anonymous statistical analyses with the purpose of improving the quality of the processes and the management of human resources.

For the specific privacy statement for the official traineeship with the European Commission, agencies and bodies, please refer to the following link: <https://europa.eu/!Pw68Ph>.

1c) From where the data are collected

Personal data are available via the database of pre-selected Blue Book candidates (the Virtual Blue Book).

Data are also collected directly from the data subjects via e-mail and through the confidentiality declarations and leaving forms.

Data may also be submitted by data subjects to the FMBs ERC-SELECTION@ec.europa.eu and ERC-SPONTANEOUS-APPLICATIONS@ec.europa.eu.

2. Who has access to your information, how is it secured and to whom is it disclosed?

The HR Unit is responsible for the management of any documents produced, circulated and/or received, ensuring the appropriate treatment of all documents.

E-mails including personal data should be sent via encrypted e-mail (SECEM). Access to files is limited to authorised personnel, regardless of where they are saved: on the ERCEA Shared Drive; the Functional Mailboxes (FMBs) ERC-SELECTION@ec.europa.eu or ERC-SPONTANEOUS-APPLICATIONS@ec.europa.eu; or of which a physical copy is kept.

The official register of the Agency is ARES/NomCom and all files therein are processed using the restricted marking. SYSPER is the HR Information System of the European Commission, access to personal data is protected by the management of the access rights, which are strictly limited to authorised personnel.

The persons with access to your personal data, on a **need-to-know basis**, are:

- The members of the HR Unit and authorised personnel dealing with the selection and everyday management of the Blue Book trainees;
- The AHCC (Authority Empowered to Conclude Contracts of Employment), i.e., the ERCEA's Director;
- Services of the European Commission: DG EAC Traineeships Office.

In addition, certain administrative details may be disclosed, in compliance with the relevant current legislation and established case law, and on a temporary basis to legislative or supervisory bodies of the ERCEA, as well as auditing bodies or courts.

3. What are your rights?

You have the right to access the personal data the ERCEA holds about you and to request to have them rectified where necessary. In certain cases, you also have the right to have your data erased, the right to object to processing or the right to data portability.

To exercise any of these rights, you should apply to the Head of Unit D.2 – “Human Resources”, who is responsible for such processing (i.e. the Controller), by sending an e-mail specifying your request to the mailbox indicated in point 5. Please note that in some cases restrictions under the terms and conditions of Article 25 of the Data Protection Regulation may apply.

4. How long do we keep your data?

- The retention periods for the personal data processed by the Traineeships Office of the European Commission are the following, as laid down in the specific privacy statement for the traineeship:
 - Data from **non-valid applications** are deleted after the application submission deadline.

- **Pre-selected and non-preselected candidates:** personal data are retained for 2 years.
- **Selected candidates:** certain documents (such as the application form, diplomas, traineeship offer) are kept for 5 years after the end of the traineeship.

Statements of insurance history containing information such as first name, last name, middle name(s), date of birth, traineeship period, DG/service and amount of the grant received are retained for 50 years after the traineeship.

Personal data shared with other EC services are stored in their IT-tools for the duration established by the Financial Regulation and the Common Retention List.

- Spontaneous applications submitted to the dedicated FMB are retained for 1 year.
- Confidentiality declarations as well as leaving forms are kept for up to 5 years.
- Medical certificates are deleted immediately at the end of the traineeship period.

The ERCEA may envisage anonymous statistical analyses with the purpose to improve the quality of the processes and the management of human resources. However, retention periods mentioned above will not be increased.

5. Contact information

If you would like to receive further information, you can contact the responsible person (the Data Controller), Head of Unit D.2 – “Human Resources” via the mailboxes: ERC-SELECTION@ec.europa.eu or ERC-SPONTANEOUS-APPLICATIONS@ec.europa.eu.

The ERCEA Data Protection Officer is at your disposal for any clarification you might need on your rights under Regulation (EU) 2018/1725 at the following e-mail address: ERC-DATA-PROTECTION@ec.europa.eu.

You may 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.

6. Legal basis

The legal basis applying to this processing operation is:

- Article 5(1)(a) of Regulation (EU) 2018/1725 given that the 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. More specifically, the processing of personal data necessary for the management and functioning of the Union Institutions or bodies (Recital 22 of Regulation (EU) 2018/1725).
- Article 5(1)(b) given that the processing is necessary for compliance with a legal obligation to which the controller is subject.

Specific legal basis:

- Rules governing the official traineeships scheme of the European Commission (Commission Decision of 2 March 2005 - C(2005)458);
- Service Level Agreement between the European Commission, Directorate-General for Education, Youth, Culture and the ERCEA, ref. ARES(2016)7132058 of 23 December 2016.