



# Record of processing activity

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## Job shadowing internship

### Record of EBA activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 (EUDPR)

Nr	Item	Description
<b>Part 1 - Article 31 Record</b>		
1	Last update of this record	05/01/2023
2	Reference number	EBA/DPR/2022/17
3	Name and contact details of controller	<p>Controller: European Banking Authority (EBA), Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France</p> <p>Responsible Department: Operations, HR Unit</p> <p>Email address: <a href="mailto:hrteam@eba.europa.eu">hrteam@eba.europa.eu</a></p>
4	Contact details of DPO	<a href="mailto:dpo@eba.europa.eu">dpo@eba.europa.eu</a>
5	Name and contact details of joint controller (where applicable)	Not applicable
6	Name and contact details of processor (where applicable)	<p>1. CANCOM online BVBA Rue Montoyer 35 Brussels Belgique Cancom provides Network services and Cisco Webex service</p> <p>2. Microsoft Ireland Operations Limited Microsoft EU Data Protection Officer One Microsoft Place South County Business Park Leopardstown Dublin 18 D18 P521 Ireland Telephone: +353 (1) 706-3117 <a href="https://aka.ms/privacyresponse">https://aka.ms/privacyresponse</a> Microsoft provides Microsoft (MS) Teams</p> <p>3. Bechtle Brussels NV/SA Peerderbaan 207 3910 Neerpelt</p>

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		<p>Belgium Bechtle provides the Jira software for IT service desk and incident management</p> <p>4. UniSystems Systemes Informatiques Societe Anonyme Comerciale Unipersonnelle Rue des Deux Eglises 26, boite 4 B-1000, Bruxelles Belgique UniSystems provides IT contractors</p> <p>5. Europlaza Building Management (CBRE - Coldwell Banker Richard Ellis) Europlaza Building Management provides access rights to the building where the EBA is located</p>
7	Short description and purpose of the processing	<p>The EBA processes personal data within the processing activity ‘Job shadowing internship’ to welcome interest from students in spending a short period of time at the EBA. The ‘Job shadowing internship’ is addressed to students aged 14 to 19 years old who may spend one or two weeks at the EBA; the Executive Director may decide for a different duration of the internship.</p> <p>The processing activity will include receiving e-mails from students with their brief Curriculum Vitae and a few motivational lines why they would like to have a job shadowing internship at the EBA. Based on this information, the EBA Human Resources Unit (HR) will assess the eligibility criteria as listed in the policy on job shadowing internship and brief interviews will be organised to select the students who will be then informed and admitted to the internship scheme.</p> <p>The purpose is to allow students to enrich their general civic culture, figure out preferences for their professional orientation.</p> <p>The processing activity will take into account the following phases: selection and admission, onboarding, evaluation and exit procedure of interns.</p>
8	Description of categories of persons whose data the EBA processes and list of data categories	<p>The EBA processes personal data of the following categories of persons:</p> <ul style="list-style-type: none"> <li>• Students aged 14 to 19 years old.</li> </ul> <p>The EBA may process personal data of students’ parents, school representative and/or any other data subject included in selection documents provided by the concerned student. Personal data will be part of the concerned intern’s internship file and will be treated accordingly.</p> <p>The EBA processes the following categories of personal data:</p> <ul style="list-style-type: none"> <li>• Selection and admission <ul style="list-style-type: none"> <li>• Personal data to identify and contact the candidate: name, surname, date of birth, nationality, postal address, email address, photo;</li> </ul> </li> </ul>

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		<ul style="list-style-type: none"> <li>• Personal data provided by the candidate: as included in their Curriculum Vitae and motivational letter;</li> <li>• Eligibility criteria: nationality, school enrolment, age, level of knowledge of English language;</li> <li>• Evaluation by the relevant manager and tutor based on an assessment grid including three levels (high/medium/low) related to the questions asked during the brief interview/exchange with the student;</li> <li>• Special categories of personal data (Article 10 EUDPR) <ul style="list-style-type: none"> <li>- health insurance;</li> <li>- information on any absence for medical reasons, communicated only to the relevant tutor by the intern themselves;</li> <li>- medical certificate only in case of need for specific ergonomic measures.</li> </ul> </li> <li>• Onboarding <ul style="list-style-type: none"> <li>• IT access rights: name, surname, contract type, job title, manager, department, unit, start date, desk location. IT access rights include: computer login, email address, laptop, phone number, distribution lists(s). IT access rights depend on the tasks the intern will perform and will be requested via the Jira software;</li> <li>• Network Services: name, surname, username and IP address. Network Services include: access to internet and intranet, remote access to internal resources from the internet, access to the internal EBA network from the internet;</li> <li>• Audio-video communication and collaboration services: login/username, name, surname, email address, location, photo, telephone number in case of joining a meeting via phone. Audio-video communication and collaboration services include: access to MS Teams and Cisco Webex;</li> <li>• Production and issuance of badge: name, surname, photo, nationality, access badge number, identity document number and dates, access rights.</li> </ul> </li> <li>• Internship certificate <ul style="list-style-type: none"> <li>• Internship certificate issued to the intern at the end of the internship: name, surname, date of birth, email address, dates and area of traineeship.</li> </ul> </li> <li>• Exit <ul style="list-style-type: none"> <li>• Deletion from IT systems: name, surname, tutor, desk location;</li> </ul> </li> </ul>

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		<ul style="list-style-type: none"> <li>Return and deletion of badge: name, surname, unit allocated, location.</li> </ul>
9	Time limit for keeping the data	<p>Time limit for keeping the data processed within this processing activity is as follows:</p> <ol style="list-style-type: none"> <li>Successful candidates           <ul style="list-style-type: none"> <li>Selection and admission               <ul style="list-style-type: none"> <li>Personal file and evaluation grid: personal data provided by the student at the selection phase will be kept for two (2) years after the termination of the internship and will then be deleted from the systems;</li> <li>Special categories of personal data will be kept until the end of the internship.</li> </ul> </li> <li>Onboarding               <ul style="list-style-type: none"> <li>IT access rights: personal data are kept as long as the intern has an internship relationship with the EBA. At the end of the internship, following the exit procedure, personal data are deleted;</li> <li>Network Services: personal data are kept as long as the intern has an internship relationship with the EBA. At the end of the internship, personal data are deleted six (6) months after the exit procedure;</li> <li>Audio-video communication and collaboration services: personal data are kept as long as the student has an internship relationship with the EBA. At the end of the internship and following the exit procedure, personal data are deleted. For additional information, please refer to the <a href="#">Record of Processing Activity 'Audio-video Communication and Collaboration Services'</a> published on the EBA website.</li> <li>Production and issuance of badge: personal data are kept as long as the intern has an internship relationship with the EBA. At the end of the internship and following the exit procedure, personal data are deleted after six (6) months.</li> </ul> </li> <li>Internship certificate               <ul style="list-style-type: none"> <li>Internship certificate: data necessary to issue a copy of the internship certificate (name, surname, date of birth, email address, dates and area of internship) are kept for ten (10) years.</li> </ul> </li> <li>Exit               <ul style="list-style-type: none"> <li>Exit form: personal data included in the exit form (name, surname, EBA manager/tutor, dates of internship, desk location) are kept for two (2) years after the termination of the internship.</li> </ul> </li> </ul> </li> <li>Unsuccessful candidates</li> </ol>

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10	Recipients of the data	<ul style="list-style-type: none"> <li>• Selection: personal data provided by the candidate are destroyed/deleted at the end of the year the application was sent.</li> </ul> <p>Recipients of personal data processed within the context of this processing activity are as follows:</p> <ul style="list-style-type: none"> <li>• Internal to the EBA <ul style="list-style-type: none"> <li>• duly authorised HR staff members;</li> <li>• Relevant EBA Manager and EBA assigned Tutor per intern;</li> <li>• EBA staff in case intern’s identity is added to the EBA directory following the relevant IT access rights are granted;</li> <li>• EBA designated Corporate Support staff for creating an access badge and following up on security incidents and investigations, if the case;</li> <li>• EBA Data Protection Officer.</li> </ul> </li> <li>• External to the EBA <ul style="list-style-type: none"> <li>• duly authorised IT Unit contractors to provide access rights to EBA systems necessary for the fulfilment of the selected intern tasks. EBA IT Unit contractors sign a confidentiality declaration with the EBA and are subject to the <a href="#">EBA Standard on Access Control and Authentication</a>.</li> <li>• Europlaza building security management to create access rights for the intern;</li> <li>• EU Institutions, if appropriate: the European Commission Internal Audit Service, the European Ombudsman, the European Court of Justice, the Anti-Fraud Office of the European Commission, the European Court of Auditors, the European Data Protection Supervisor.</li> </ul> </li> </ul>
11	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	In case access to MS Teams and/or Cisco Webex is provided, please refer to the <a href="#">Record of Processing Activity ‘Audio-video Communication and Collaboration Services’ published on the EBA website</a> .
12	General description of security measures, where possible	Processing of personal data in the context of this processing activity is performed under the <a href="#">EBA Information Security Framework, published on the EBA intranet</a> .
13	For more information, including how to exercise your rights to access, rectification, object and data portability (where	<a href="#">Data Protection Notice ‘Job shadowing internship’</a>

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