

Record of Personal Data Protection of Personal Data Processing Activity, pursuant to Article 31 of Regulation (EU) 2018/1725¹

NAME OF PROCESSING OPERATION: Processing of personal data in the context of trainee selection procedures at the EBA

I. GENERAL INFORMATION

1) Contact Details of Controller(s)

Name: European Banking Authority, represented by Executive Director
 Email Address: ExecutiveOffice@eba.europa.eu

2) Contact Details of Processor

Who is actually conducting the processing?

The data is processed by:

The EBA itself: The Human Resources Unit will be conducting the processing activity.

Email address: EBA-Traineeship-Applications@eba.europa.eu and traineeship@eba.europa.eu

II. DESCRIPTION & PURPOSE OF PROCESSING

3) Description of Processing

The EBA organises selection procedures with the aim of filling a particular traineeship vacancy and/or establishing reserve lists of successful candidates in view of possible traineeship at the EBA.

4) Purpose of processing

Why are the personal data being processed?

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

Specify the rationale and underlying reason for the processing

- Staff administration
- Relations with external parties
- Procurement, finance and accounting
- Administration of membership records
- Auditing
- Information administration

Other (please give details): The purpose of processing of the data that is submitted by a candidate in a selection procedure is to manage a candidate(s) application(s) in view of a possible traineeship at the EBA. The EBA will not reuse the personal data for another purpose that is different to this.

5) Lawfulness of Processing

Article 5 of Regulation (EU) 2018/1725

A. Legal Basis justifying the processing:

Processing is based on the Article 5 (a) of the Regulation (EU) No. 2018/1725 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data., providing that : (a) a task carried out in the public interest or in the exercise of official authority vested in EMSA (including management and functioning of the institution).

The personal data are collected and processed in accordance with:

- Regulation (EU) No 1093/2010 of the European Parliament and the Council of 24 November 2010 establishing the EBA;
- [EBA Decision EBA DC 263 on paid traineeships offered by the European Banking Authority to young university graduates and its Annex](#)

Candidates send their applications containing a Europass CV, motivation letter, eligibility criteria grid and other information they may wish to submit to EBA-Traineeship-Applications@eba.europa.eu and traineeship@eba.europa.eu on a voluntary basis. The data subject gives their explicit consent to the EBA for their processing by doing this.

B. Processing is necessary:

- for the performance of a task carried out in the public interest

- for compliance with a legal obligation to which the Controller is subject
- for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- in order to protect the vital interests of the data subject or of another natural person

Or

- Data subject has given his/her unambiguous, free, specific and informed consent

As mentioned above, candidates for the traineeship give their explicit consent to the EBA to process their data by submitting applications and any other supporting documents for traineeship selection procedures that are published by the EBA.

III. CATEGORIES OF DATA SUBJECTS & PERSONAL DATA

6) Categories of Data Subjects

Please tick all that apply and give details where appropriate

- EBA Temporary Agents or Contract Agents
- SNEs or trainees: Only trainees are applicable for this data record
- Visitors to the EBA (BoS, MB, Working Groups, Sub-Groups, Seminars, Events, other)
If yes, please specify:
- Providers of good or services
- Complainants, correspondents and enquirers
- Relatives and associates of data subjects

Other (please specify): Candidates applying for traineeship vacancies at the EBA.

7) Categories of personal data

Please tick all that apply and give details where appropriate

(a) General personal data:

Personal details (name, address etc.): Information provided by the candidate to allow themselves to be identified and contacted e.g. surname, first name, address, email address, telephone number, gender, date of birth, nationality, social media accounts e.g LinkedIn, Skype, motivation for the traineeship. If a candidate receives an invitation for an interview and/or written test, the following data will be processed: Identity card/passport.

Education & Training details: Start and end dates, title of qualification awarded, diploma (level in the national and/or international classification), name and location of the organisation providing the education or the training, main study subjects or occupational skills covered, examples of written work produced during their studies (if requested in the vacancy).

Languages: Including, for each language, the level in understanding, speaking and writing the language.

Other skills or information: Communication skills, organisational skills, job related skills, digital skills including a self-assessment on information processing, communication, content creation, safety, problem solving and knowledge of computer software, commitment to adhere to any security checks, if necessary, and any other additional information the candidate declares in a spontaneous basis or would like to annex to the application. Information on studies or publications on EU, EBA core business related topics.

In addition, the candidate is also requested to submit a copy of his/her university diploma(s).

Employment details: For each experience: the start and end dates/ongoing, employer information (name, city and Country), Type of employment (paid trainee, unpaid trainee/voluntary, permanent employee, temporary employee, self-employed, other), description of the position.

Financial details:

Family, lifestyle and social circumstances

Other (please give details): Candidates should inform the EBA if they have a disability that requires special arrangements to participate in the selection procedure.

(b) Special categories of personal data:

The personal data reveals:

Racial or ethnic origin

Political opinions

Religious or philosophical beliefs

- Trade union membership
- Genetic or Biometric data
- Data concerning health, sex life or sexual orientation: Candidates should inform the EBA if they have a disability that requires special arrangements to participate in the selection procedure.

Important Note
If you have ticked any of the sensitive data boxes contact the Data Protection Officer before processing the data further.

IV. CATEGORIES OF RECIPIENTS & DATA TRANSFERS

8) Recipient(s) of the data

To whom is the data disclosed?

- Managers of data subjects
- Designated EBA staff members:
- The relevant EBA Human Resources staff members;
 - The members of the Selection Committee;
 - The Directors of Department/Heads of Unit and/or delegated staff of a recruiting department/unit who will consult the CVs and motivation letters of candidates on a relevant reserve list;
 - The Appointing Authority, i.e., the EBA's Executive Director.

Also, if appropriate, access will be given to the specialised members of the ICT Unit involved in the management of the Human Resources processes and the EBA's Legal Unit in the case of legal complaints.

- Relatives or others associated with data subjects
- Current, past or prospective employers
- Healthcare practitioners
- Education/training establishments
- Financial organisations
- External contractor

Other (please specify):

Also, if appropriate, access will be given to EU staff with the statutory right to access the data required by their function, i.e. the European Ombudsman, the Civil Service Tribunal, the Internal Audit Service, the European Court of Auditors, OLAF and the European Data Protection Supervisor.

9) Data transfer(s)

Is the data transferred outside the EBA?

Within the EBA or to other EU Institutions/Agencies/Bodies

If yes, please specify: The data will only be transferred between the HR unit, members of the selection committee, Directors of Department/Heads of Unit and/or delegated staff of a recruiting department/unit who will consult the CVs and motivation letters of candidates on a relevant reserve list, the Executive Director/Acting executive Director. If appropriate, access will be given to the specialised members of the ICT Unit involved in the management of the Human Resources processes and the EBA's Legal Unit in the case of legal complaints

To other recipients within the EU (e.g. NCAs)

If appropriate, access will be given to EU staff with the statutory right to access the data required by their function, i.e. the European Ombudsman, the Civil Service Tribunal, the Internal Audit Service, the European Court of Auditors, OLAF and the European Data Protection Supervisor.

To third countries

If yes, please specify:

a) the country:

b) whether suitable safeguards have been adopted:

Adequacy Decision of the European Commission²

Standard Contractual Clauses

Binding Corporate Rules

Administrative Arrangements between public Authorities

To international organisations

If yes, please specify the organisation and whether suitable safeguards have been adopted:

² Third countries for which the European Commission has issued adequacy decisions are the following: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

Important Note

If no safeguards have been put in place, please contact the DPO before processing the data further.

V. RETENTION PERIOD & SECURITY MEASURES**10) Retention period (see Note 7)**

A. How long will the data be retained and what is the justification for the retention period?

EBA does not keep personal data longer than necessary for the purpose(s) for which that personal data is collected.

The data will be retained as described below:

The data will be retained for varying periods depending on the outcome of each application:

- Successful candidates: the data will be stored for ten years as of the termination of traineeship.
- Candidates included on a reserve list but not offered a traineeship at the EBA: the data will be stored for the duration of the validity of the reserve list and then for three years following the expiry of the reserve list's validity.
- Non-successful candidates: the data will be stored for three years following the Appointing Authority's decision on the traineeship offer to be made.

B. For further processing envisaged beyond the original retention period for historical, statistical or scientific purposes, please specify whether the personal data will be anonymised: N/A

No

Yes: After the allotted timeframe for retention of personal data has elapsed, the EBA may need to keep certain information for statistical purposes. In this case, any data permitting the identification of the candidate will be destroyed according to Article 4 of Regulation (EU) 2018/1725

11) Storage media & security of processing

A. Please indicate how and where the data processed are stored (e.g. Share Point / cloud):

All personal data related to the selection procedure are stored in specific electronic and physical paper folders accessible only to the authorised recipients. Appropriate levels of access are granted on an individual basis only to the above recipients (see point 8 above).

B. Technical & Organisational Security measures adopted:

Controlled access to ICT-system/controlled access codes

Restricted access to physical location where data is stored

Pseudonymisation and Encryption

Back-up

Audit trails

- Confidentiality agreement/clause
- Test the effectiveness of security measures adopted
- Training of staff

Other (please specify): EBA staff members dealing with personal data in the context of the selection procedures at any stage are obliged to sign a confidentiality declaration that is kept in the folder of the procedure or in his/her personal file.

Selection procedure documents are stored in an electronic folder that is restricted only to the members of the selection committee and the Human Resources Unit during the selection and only the Human Resources Unit thereon after.

Consultation of the Data Protection Officer

Date of consultation: 20/10/2020

Date of approval of processing: 30/10/2020

Privacy statement available at: <https://www.eba.europa.eu/about-us/careers>

Date of insertion in Register: 30/10/2020