

# Record of processing activity

## Young Talents Programmes

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

### Part 1 - Article 31 Record (publicly available)

1	<b>Last update of this record</b>	23/12/2025
2	<b>Date of next review</b>	23/12/2027
3	<b>Reference number</b>	EBA/DPR/2025/7
4	<b>Name and contact details of controller</b>	Controller: European Banking Authority, Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France  Responsible Department: Operations, HR Unit  Contact: <a href="mailto:hrteam@eba.europa.eu">hrteam@eba.europa.eu</a>
5	<b>Contact details of DPO</b>	<a href="mailto:dpo@eba.europa.eu">dpo@eba.europa.eu</a>
6	<b>Name and contact details of joint controller (where applicable)</b>	Not applicable
7	<b>Name and contact details of processor (where applicable)</b>	1. CANCOM – Belgium, providing Network services and Cisco Webex service; 2. Microsoft Ireland Operations Limited – Ireland, providing Microsoft Teams; 3. Bechtle – Belgium, providing the Jira software for IT service desk and incident management; 4. UniSystems – Belgium, providing IT Unit contractors; 5. Europlaza Building Management (CBRE - Coldwell Banker Richard Ellis), providing access rights to the EBA premises
8	<b>Short description and purpose of the processing activity</b>	The EBA processes personal data of interns, students and trainees within the context of the Young Talents Programmes. The processing activity will take into account the following phases: selection and admission, onboarding, evaluation and exit procedure. The purpose of this processing activity, respectively the policy on young talents programme is to provide a framework for

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these programmes available at the EBA, whereas interns, students and trainees, will enrich their general civic culture by helping them discover the professional world in its diversity, discover their preferences for their professional orientation, and overall they will be provided with a unique and first-hand experience of the workings of the EBA.

The Policy on Young Talents Programmes encompasses the following three programmes:

**1. The EBA Job Shadowing Programme**, whereas the EBA processes personal data to welcome interest from students in spending a short period of time (1-2 weeks) at the EBA. The 'Job shadowing internship' is addressed to students aged 14 to 19 years old.

**2. The EBA Students Programme** is addressed to students who are enrolled in post-secondary or high education or equivalent level who, typically for a duration of 1 to 5 months, who need to acquire practical work experience, or to fulfil mandatory academic training, or to undertake a stage/training as part of the university/school requirement.

**3. The EBA's Traineeship Programme** is addressed to university graduates who completed their studies who for a period of 6 to 18 months maximum, will acquire practical experience and knowledge of the day-to-day work of the EBA.

**9 Description of categories of persons whose data the EBA processes and list of data categories**

**1. Job Shadowing Programme - students aged 14 to 19 years old.**

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.

The EBA processes the following categories of personal data:

a) Selection and admission

- Personal data to identify and contact the candidate: name, surname, date of birth, nationality, postal address, email address, phone number, photo.
- Personal data provided by the candidate: as included in their Curriculum Vitae and motivational letter.
- Eligibility criteria: nationality, school enrolment, age, level of knowledge of English language.
- 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.

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- Special categories of personal data (Article 10 EUDPR):
  - health insurance.
  - information on any absence for medical reasons, communicated only to the relevant tutor by the intern themselves.
  - medical certificate only in case of need for specific ergonomic measures.
  - description of any disabilities, so that the necessary accessibility measures can be put in place in view of organising the participation in the selection/admission phase.

#### Onboarding

- IT access rights: name, surname, contract type, job title, manager, department, unit, start/end date.
- 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.
- Production and issuance of badge: name, surname, start/end date, unit/department.

#### Internship certificate

- Internship certificate issued to the intern at the end of the internship: name, surname, start/end date, email address, dates and area of internship.

#### Exit

- Deletion from IT systems: name, surname, start/end date, tutor name.
- Return and deletion of badge: name, surname, unit/department allocated, start/end date.

## 2. The EBA Students Programme - students who are enrolled in post-secondary or high education or equivalent level.

The EBA processes the following categories of personal data:

#### Selection and admission

- Personal data to identify and contact the candidate: name, surname, date of birth, nationality, postal address, email address, phone number, photo.
- Personal data provided by the candidate: as included in their Curriculum Vitae and motivational letter.

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- Personal data provided by the candidate in relation to the admission criteria: nationality, education information, English level etc.
- Evaluation by the relevant EBA Units including assessment grid and interview/exchanges.

**Onboarding**

- Documents: ID/passport, diplomas or equivalent certificates/school references etc.
- EBA's tutor's name.
- If applicable, copy/proof of VISA.
- Health Insurance.
- Declaration on assessment of conflict of interest: name, surname, department/unit, start/end date, CV.
- IT access rights: name, surname, contract type, job title, manager, department, unit, start/end 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 student will perform and will be requested via the Jira software

- 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.
- 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.
- Production and issuance of badge: name, surname, access badge number, photo, identity document number; start/end date, unit/department, access rights.
- Only in the context of promoting studentship programme, students might be approached to take part to testimonials, group or individual photos / videos; in this case, the students will be informed of their rights as well as the details of the processing of this data (data controller, objective, duration of storage, rights).

**Studentship certificate**

- Studentship certificate at the end of the programme: name, surname, email address, dates and area of studentship.

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- Exit form data.
- Deletion from IT systems: name, surname, tutor, desk location.
- Return and deletion of badge: name, surname, access badge number, photo, identity document number; start/end date, unit/department, access rights.

**3. Traineeship Programme - university graduates who completed their studies**

The EBA processes the following categories of personal data:

**Selection and admission**

- Personal information (surname, first name, middle name, maiden name, nationality and date of birth).
- Contact details (permanent address, telephone number and email address, name, address and telephone number of the person to be contacted in the event of an emergency, EU Login).
- Information on higher education, professional experience, language skills, research or possible publications, as well as, computer and office automation skills, information on the motivations and preferences regarding the type of traineeship and the field of activity.
- Personal data provided by the candidate as included in the eligibility grid, in relation to the admission criteria: nationality, education information, English level etc.
- Evaluation by the relevant EBA Units including assessment grid and interview/exchanges.
- Copy of University diploma(s).
- Copy of passport or identity card.
- Copy - and translation, if necessary - of the diplomas and Proof of studies declared in the application form.
- Proof of linguistic knowledge (copy of diplomas, certificates) declared.
- If applicable, proof of declared professional experience (certificate from the employer).
- Description of any disabilities, so that the necessary accessibility measures can be put in place in view of organising the participation in the selection.

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**Onboarding**

- Financial data in view of registering in the ABAC/SUMA system and payment of the traineeship grant: legal entity form, financial identification form, bank statement details.
- Electronic photo for the production of the access card to the EBA's premises.
- If applicable, copy/proof of VISA.
- Description of any disabilities, so that the necessary accessibility measures can be put in place.
- Only in the context of promoting traineeship programme, trainees might be approached to take part to testimonials, group or individual photos / videos; in this case, the trainees will be informed of their rights as well as the details of the processing of this data (data controller, objective, duration of storage, rights).
- Declaration on assessment of conflict of interest: name, surname, department/unit, start/end date, CV.

**Exit**

- Exit form data.
- Deletion from IT systems: name, surname, tutor, desk location.
- Return and deletion of badge: name, surname, unit allocated, location.

10	<b>Special categories of personal data processed (as defined in Article 10 EUDPR)</b>	No special categories of personal data are specifically required for the performance of this processing activity. Certain special categories of personal data such as operational personal data related to health, in particular description of any disabilities can be processed to ensure necessary accessibility measures can be put in place.
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11	<b>Time limit for keeping the data</b>	EBA does not keep personal data longer than necessary for the purposes for which that personal data is collected.
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The data will be retained as described below:

**1. The EBA Job Shadowing Programme** - data will be retained for varying periods depending on the outcome of each application:

- Selected candidates: the data will be stored in their personal files/selection file for five (5) years as of the termination of internship.
- Non-selected candidates: the data will be deleted as of the date they become aware of the outcome of the application.

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**2.The EBA Students Programme** - data will be retained for varying periods depending on the outcome of each application:

- Selected candidates: the data will be stored in their personal files/selection file for five (5) years as of the termination of studentship.
- Non-selected candidates: the data will be deleted as of the date they become aware of the outcome of the application.

**3.The EBA's Traineeship Programme** - data will be retained for varying periods depending on the outcome of each application:

- Selected candidates: the data will be stored for five (5) years as of the termination of traineeship.
- Non-selected candidates: the data will be stored for a period of one (1) year as of the date they become aware of the outcome of their application.

<b>12 Recipients of the data</b>	<p>The personal data can be accessed at different levels of processed by the following within the EBA:</p> <ul style="list-style-type: none"> <li>• The relevant EBA Human Resources staff members.</li> <li>• The Assistant of the Head of Operations.</li> <li>• 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.</li> <li>• The Appointing Authority, i.e. the EBA's Executive Director.</li> <li>• If necessary, access will be given to the specialised members of the IT Unit involved in the management of the Human Resources processes and the EBA's Legal Unit in the case of legal complaints.</li> <li>• If necessary, a limited number of staff of the Finance and Procurement Unit (for the traineeship programme).</li> <li>• Ethics officer in case of issues pertaining to conflict of interest situations arise (for the traineeship programme).</li> <li>• Upon request, for auditing purposes, the data may be disclosed for Internal Audit, OLAF, Court of Auditors, the European Ombudsman, the European Data Protection Supervisor etc.</li> </ul>
<b>13 Are there any transfers of personal data to third countries or international organisations?</b>	<p>The personal data is processed by the EBA within the EU/EEA.</p>

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14	<b>General description of security measures, where possible</b>	All the collected data are stored electronically accessible only to the authorised recipients. Appropriate levels of access are granted on an individual basis only to the above recipients. Moreover, 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>
15	<b>For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:</b>	The General Data Protection Notice is available on the EBA website. Specific Data Protection Notice are also provided directly to the data subjects concerned.