Data Protection Notice

Job shadowing Internship

The European Banking Authority (EBA) processes personal data within the processing activity ‘Job shadowing internship’ to allow students aged 14 to 19 years old to spend a short period of time at the EBA with the purpose to enrich their general civic culture and to figure out preferences for their professional orientation.


The following information is provided as established in Articles 15 and 16 of the EUDPR.

Who is the controller?

The EBA is the controller with regard to the data processing activities described in this data protection notice.

Responsible service: EBA Human Resources Unit; email address: hrteam@eba.europa.eu

For more information on the EBA, please consult the EBA website https://eba.europa.eu.

The following processors are engaged as part of the processing activity:

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.

6. What personal data do we process, for what purpose, who can access it and how long do we keep them?

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.

The purpose is to allow students to enrich their general civic culture, figure out preferences for their professional orientation.
The processing activity will take into account the following phases: selection and admission, onboarding, evaluation and exit procedure of interns.

The EBA processes personal data of the following categories of persons:

- 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:

- **Selection and admission**
  - Personal data to identify and contact the candidate: name, surname, date of birth, nationality, postal address, email address, 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;
  - 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.

- **Onboarding**
  - 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;
  - 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, photo, nationality, access badge number, identity document number and dates, access rights.

- **Internship certificate**
  - Internship certificate issued to the intern at the end of the internship: name, surname, date of birth, email address, dates and area of traineeship.
Exit

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

Personal data processed can be accessed by:

- duly authorised HR staff members;
- relevant EBA Manager and EBA assigned Tutor per intern;
- EBA staff in case intern’s identity is added to the EBA directory following the relevant IT access rights are granted;
- EBA designated Corporate Support staff for creating an access badge and following up on security incidents and investigations, if the case;
- EBA Data Protection Officer (DPO);
- duly authorised IT Unit contractors to provide access rights to EBA systems necessary for the fulfillment of the selected intern tasks.
  EBA IT Unit contractors sign a confidentiality declaration with the EBA and are subject to the EBA Standard on Access Control and Authentication;
- Europazila building security management to create access right for the intern;
- European Union 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.

Time limits to store personal data are as follows:

1. Successful candidates

   - Selection and admission
     - Personal file: 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;
     - Special categories of personal data will be kept until the end of the internship.

   - Onboarding
     - 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;
     - 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;
     - 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 Record of Processing Activity ‘Audio-video Communication and Collaboration Services’ published on the EBA website.
     - 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.
• Internship certificate
  • 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.

• Exit
  • 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.

2. Unsuccessful candidates
• Selection: personal data provided by the candidate are destroyed/deleted at the end of the year the application was sent.

Why do we process your personal data and under what legal basis?

The lawfulness of this processing activity is based on 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 (EUDPR), Article 5(1)(a2)(c).

The legal bases of the above-mentioned processing activity are:

• EBA Decision (EBA/DC/471) concerning Policy on Job Shadowing Internship;
• EBA internship agreement with the school and the data subject.

Will the processing of your personal data involve any transfer outside of the EU?

In case access to MS Teams and/or Cisco Webex is provided, please refer to the Record of Processing Activity ‘Audio-video Communication and Collaboration Services’ published on the EBA website.

What are your rights regarding your personal data?

You have the right of access to your personal data and to relevant information concerning how we use it. You have the right to rectify your personal data. Under certain conditions, you have the right to ask that we delete your personal data or restrict its use. You have the right to object to our processing of your personal data, on grounds relating to your particular situation, at any time. We will consider your request, take a decision and communicate it to you. For more information, please see Articles 14 to 21, 23 and 24 EUDPR.

You can send your request by post in a sealed envelope or via email (see section on contact details below).
You have the right to lodge a complaint

If you have any remarks or complaints regarding the way we process your personal data, we invite you to contact the DPO of the EBA (see section on contact details below).

You have, in any case, the right to lodge a complaint with the European Data Protection Supervisor, our supervisory authority for data protection matters.

Contact details for enquiries regarding your personal data

Should you wish to contact the EBA, we encourage you to do so by email: hrteam@eba.europa.eu by stating in the subject “Data Protection Enquiry”.

If you wish to contact the DPO of the EBA personally, you can send an e-mail to dpo@eba.europa.eu or a letter to the postal address of the EBA marked for the attention of the DPO of the EBA.

The postal address of the EBA is DEFENSE 4 – EUROPLAZA, 20 Avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France.

You can also find contact information on the EBA’s website: https://eba.europa.eu/contacts