

**RECORD OF PROCESSING ACTIVITY
ACCORDING TO ARTICLE 31 REGULATION 2018/1725¹
NOTIFICATION TO THE DATA PROTECTION OFFICER**

NAME OF PROCESSING OPERATION²: Selection Procedures for recruiting Trainees

DPR-2018-037 (to be completed by the DPO)
Creation date of this record: 21/12/2018
Last update of this record: 27/04/2021
Version: 3.0

1) Controller(s)³ of data processing operation (Article 31.1(a))
Controller: European Union Agency for Fundamental Rights (FRA) Organisational unit responsible⁴ for the processing activity: Corporate Services Contact: recruitment@fra.europa.eu . Data Protection Officer (DPO): dpo@fra.europa.eu

2) Who is actually conducting the processing? (Article 31.1(a))⁵
The data is processed by the FRA itself <input checked="" type="checkbox"/>
The data is processed also by a third party (Limesurvey) <input checked="" type="checkbox"/>

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

² **Personal data** is any information relating to an identified or identifiable natural person, i.e. someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity. This information may, for example, be the name, date of birth, a telephone number, biometric data, medical data, a picture, professional details, etc.

Processing means any operation or set of operations which is performed on personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

³ In case of more than one controller (e.g. joint FRA research), all controllers need to be listed here

⁴ This is the unit that decides that the processing takes place and why.

⁵ Is the FRA itself conducting the processing? Or has a provider been contracted?

3) Purpose of the processing (Article 31.1(b))

Why are the personal data being processed? Please provide a very concise description of what you intend to achieve with the processing operation. Specify the rationale and underlying reason for the processing and describe the individual steps used for the processing. If you do this on a specific legal basis, mention it as well (e.g. staff regulations for selection procedures).

The purpose of the processing of the personal data is to organise selection procedures to recruit trainees; to manage applications at the various stages of these selection procedures. The processing operation is in line with FRA's Decision CS/023/2017 on the rules governing the traineeship programme and Decision CS/024/018 on the rules governing the Roma traineeship programme and FRA's Director Decision DIR/007/2021 on the rules governing the traineeship programme for people with disabilities.

4) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are being processed?

We process the personal data on every person who applies for the published selection procedure for the Traineeship programme.

5) Categories of personal data processed (Article 31.1(c))

Please tick all that apply and give details where appropriate. Include information if automated decision making takes place, evaluation and monitoring

(a) General personal data:

The personal data contains:

- identification (name, surname, date of birth, gender, nationality, photo), contact details (postal address, email address, phone, mobile and fax number);
- experience (work experience, education, training skills, languages, true certified copies of their diplomas, letter of motivation);
- others (only for selected candidates): a copy of ID or Passport, social security certificate, banking details (financial identification form, bank account information).

(b) Special categories of data (Article 10) :

- information on the needs for reasonable accommodation arrangements, in case of individuals applying for the traineeship programme for people with disabilities (Art 7 of the FRA's Director Decision DIR/007/2021);
- others (only for selected candidates): medical certificate, military/civil service record, criminal record, and in case of individuals with disabilities, an official document from a national authority or any accredited body confirming the disability.

6) Recipient(s) of the data (Article 31.1 (d))⁶

*Recipients are all parties who have access to the personal data. Who will have access to the data **within** FRA? Who will have access to the data **outside** FRA?*

Designated **FRA** staff members (please specify which team and Unit)

During the selection process, the personal data of the applicants are handled by a restricted number of staff in Corporate Services Unit, the Head of Unit Corporate Services, the Heads of Unit and restricted staff working within the Units interested to select an applicant, and the Director's Office.

The information related to disability will be only made available to people within the Corporate Services Unit designated for processing those kind of data having as aim to ensure the proper run of the selection, the arrangements required for providing reasonable accommodation and the additional grants that can be provided

Designated persons **outside** FRA: (please specify)

In addition, the personal data of applicants are transferred to the staff members involved in the financial workflow for reimbursement of expenses and to a restricted number of staff members from the Directorate-General for Budget (DG BUDG) at the European Commission.

7) Transfers to third countries or recipients outside the EEA (Article 31.1 (e))⁷

If the personal data are transferred outside the European Economic Area, this needs to be specifically mentioned, since it increases the risks of the processing operation.

Data are transferred to third country recipients:

Yes

No

⁶ No need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS).

⁷ **Processor** in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty. If needed, consult your DPO for more information on how to ensure safeguards.

8) Retention time (Article 4(e))

How long will the data be retained and what is the justification for the retention period? Please indicate the starting point and differentiate between categories of persons or data where needed (e.g. in selection procedures candidates who made it onto the reserve list vs. those who didn't). Are the data limited according to the adage "as long as necessary, as short as possible"?

1. Documents related to recruited candidates for a trainee position: five years counting from the starting date of the traineeship contract. This period covers budgetary discharge.
2. Documents related to unsuccessful candidates: two years counting from the starting date of the traineeship period they have applied. This period covers complaints data subject may lodge to the European Ombudsman.
3. Upon arrival of the trainee, the Agency will check the criminal record and give it back to the trainee.

9) Technical and organisational security measures (Article 31.1(g))

Please specify where/how the data are stored during and after the processing; please describe the security measures taken by FRA or by the contractor

How is the data stored?

- | | |
|--|-------------------------------------|
| FRA network shared drive | <input checked="" type="checkbox"/> |
| FRA DMS | <input checked="" type="checkbox"/> |
| Outlook Folder(s) | <input checked="" type="checkbox"/> |
| CRM | <input type="checkbox"/> |
| Hardcopy file | <input checked="" type="checkbox"/> |
| Cloud (give details, e.g. Microsoft OneDrive): | <input checked="" type="checkbox"/> |
| Servers of external provider | <input checked="" type="checkbox"/> |
- Other (please specify): The data is stored in the EU and no transferred outside EU; The personal data collected via cookies is a unique IP to enable the user to submit his/her application.