

RECORD OF PERSONAL DATA PROCESSING ACTIVITY according to Article 31 of Regulation (EU) 2018/1725

▶ **TRAINEESHIPS**

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General information

Introduction
EIOPA, as a European Authority, is committed to protect individuals with regard to the processing of their personal data in accordance with Regulation (EU) No 2018/1725 (further referred as the Regulation) ¹ .
Contact Details of Data Controller(s)
Fausto Parente, Executive Director Westhafenplatz 1, 60327 Frankfurt am Main, Germany fausto.parente@eiopa.europa.eu
Contact Details of the Data Protection Officer
Eleni Karatza Westhafenplatz 1, 60327 Frankfurt am Main, Germany dpo@eiopa.europa.eu
Contact Details of Processor
EIOPA’s Team/Unit/Department responsible for the processing: - HR Unit

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.

Description and Purpose of the Processing

Description of Processing
<p>The purpose of the processing of the trainees’ personal data is the following:</p> <ul style="list-style-type: none"> - To administer the trainees of the Agency, - To define entitlements granted to the trainees. <p>EIOPA receives candidate applications through a dedicated e-recruitment tool (‘Gestmax’) maintained by an external contractor as data processor. As part of the selection procedures EIOPA conducts remote written tests. During the written examination the candidates are supervised by an external proctor. This invigilated remote testing service is provided by an external contractor (‘TestReach’) as data processor (only for TA, CA and SNEs, call for traineeship does not include written test).</p>
Purpose (s) of the processing
<p><input checked="" type="checkbox"/> Staff administration</p> <p><input checked="" type="checkbox"/> Relations with external parties</p> <p><input type="checkbox"/> Procurement and accounting</p> <p><input checked="" type="checkbox"/> Administration of membership records</p> <p><input type="checkbox"/> Auditing</p> <p><input checked="" type="checkbox"/> Information administration</p> <p><input type="checkbox"/> Other (please give details):</p>
Lawfulness of Processing
<ul style="list-style-type: none"> • Legal Basis justifying the processing: <ul style="list-style-type: none"> - Policy on traineeship at EIOPA - Regulation (EEC) No 312 laying down the Staff Regulations of Officials (SR) and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community (CEOS), in particular Articles 27-34 (SR), Articles 12-15 (CEOS) and Articles 82-84 (CEOS). • Processing is necessary: <ul style="list-style-type: none"> <input checked="" type="checkbox"/> for the performance of a task carried out in the public interest <input type="checkbox"/> for compliance with a legal obligation to which the Controller is subject <input type="checkbox"/> 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 <input type="checkbox"/> in order to protect the vital interests of the data subject or of another natural person <p>Or</p> <ul style="list-style-type: none"> <input type="checkbox"/> Data subject has given his/her unambiguous, free, specific and informed consent

Data Subject's Rights

Information on how to exercise data subject's rights
<p>Data subjects may exercise their data privacy rights provided in Articles 17 to 24 of the Regulation (EU) 1725/2018.</p> <p>Data subjects have the right to:</p> <ul style="list-style-type: none">• access their personal data, receive a copy of them in a structured and machine-readable format or have them directly transmitted to another controller, as well as request their rectification or update in case they are not accurate.• request the erasure of their personal data, as well as object to or obtain the restriction of their processing.• withdraw their consent to the processing of their personal data at any time in case such processing is based solely on their consent. <p>For the protection of the data subjects' privacy and security, every reasonable step shall be taken to ensure that their identity is verified before granting access, or rectification, or deletion.</p> <p>Should data subjects wish to access/rectify/delete their personal data, or receive a copy of them/have it transmitted to another controller, or object to/restrict their processing, please contact human.resources@eiopa.europa.eu or DPO@eiopa.europa.eu.</p> <p><u>Complaint:</u></p> <p>Any complaint concerning the processing of the data subjects' personal data can be addressed to EIOPA's Data Protection Officer (DPO@eiopa.europa.eu). Alternatively, data subjects can also have at any time recourse to the European Data Protection Supervisor (www.edps.europa.eu).</p> <p><u>Restrictions:</u></p> <p>Without prejudice to the above, rights might be restricted in accordance with EIOPA's decision on the restriction of data subject's rights (EIOPA-MB-19-056).</p>

Categories of Data Subjects & Personal Data

Categories of Data Subjects
<p><input type="checkbox"/> EIOPA permanent staff, Temporary or Contract Agents</p> <p><input type="checkbox"/> SNEs or trainees</p> <p><input type="checkbox"/> Visitors to EIOPA (BOS, MB, WG, Seminars, Events, other)</p> <p> If selected, please specify:</p> <p><input type="checkbox"/> Providers of good or services</p>

<input type="checkbox"/> Complainants, correspondents and enquirers <input type="checkbox"/> Relatives and associates of data subjects <input checked="" type="checkbox"/> Other (please specify): Job (traineeship) Applicants
Categories of personal data
<p>(a) General personal data:</p> <p>The personal data contains:</p> <input checked="" type="checkbox"/> Personal details (name, address etc) <input checked="" type="checkbox"/> Education & Training details <input checked="" type="checkbox"/> Employment details <input checked="" type="checkbox"/> Financial details <input checked="" type="checkbox"/> Family, lifestyle and social circumstances <input checked="" type="checkbox"/> Other (please give details): ... <ol style="list-style-type: none"> 1. Documents needed prior the employment of the trainee: CV-related data (name, age, gender and nationality, address, education, language skills, qualifications obtained, job-related/professional training and membership of professional bodies), Criminal record excerpt, birth certificate, Diplomas, declaration of interest, copy of valid ID card/Passport, copy of a valid insurance policy covering the trainee for illness and accident, data contained in the Legal Entity Form. 2. Documents necessary for the identification of the individual entitlements (proof of travel, statement of income, data contained in the Bank Account Form) 3. data related to the contractual relationship between the Agency and the trainees (duration of contract, contract extensions, remuneration, job assignments, language skills), 4. data related to time management (working schedules, leaves and absences) of the trainees, 5. data used in the documentation at the end of the traineeship (feedbacks on performance, certification of attestation).
<p>(b) Special categories of personal data</p> <p>The personal data reveals:</p> <input type="checkbox"/> Racial or ethnic origin <input type="checkbox"/> Political opinions <input type="checkbox"/> Religious or philosophical beliefs <input type="checkbox"/> Trade union membership <input type="checkbox"/> Genetic or Biometric data <input type="checkbox"/> Data concerning health, sex life or sexual orientation

Categories of Recipients & Data Transfers

Recipient(s) of the data
<p><input checked="" type="checkbox"/> Managers of data subjects</p> <p><input checked="" type="checkbox"/> Designated EIOPA staff members</p> <p>If selected, please specify:</p> <ul style="list-style-type: none">- HR Unit, Legal Unit, Finance Team <p><input type="checkbox"/> Relatives or others associated with data subjects</p> <p><input type="checkbox"/> Current, past or prospective employers</p> <p><input type="checkbox"/> Healthcare practitioners</p> <p><input checked="" type="checkbox"/> Education/training establishments</p> <p><input type="checkbox"/> Financial organisations</p> <p><input checked="" type="checkbox"/> External contractor (Gestmax)</p> <p><input checked="" type="checkbox"/> Other (please specify):</p> <p>Data can also be transferred for specific purposes of control to auditing or inquiring bodies (OLAF, the Court of Auditors, EDPS) and external lawyers.....</p>
Data transfer(s)
<p><input type="checkbox"/> To third countries</p> <p>If selected, please specify:</p> <p>Whether suitable safeguards have been adopted:</p> <ul style="list-style-type: none"><input type="checkbox"/> Adequacy Decision of the European Commission²<input type="checkbox"/> Standard Contractual Clauses (SCC)<input type="checkbox"/> Binding Corporate Rules (BCR)<input type="checkbox"/> Administrative Arrangements between public Authorities (AA) <p><input type="checkbox"/> To international organisations</p> <p>If selected, please specify the organisation and whether suitable safeguards have been adopted:</p>
<p>Data subjects could obtain a copy of SCC, BCR or AA here:</p> <p>.....</p>

² Third countries for which the European Commission has issued adequacy decisions are the following: Adequacy decisions (europa.eu)

Automated Decision Making

Automated Decision-making, including profiling
A decision is taken in the context of this processing operation solely on the basis of automated means or profiling: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes In case of an automated decision-making or profiling, please explain:

Retention Period & Security Measures

Retention period
How long will the data be retained? The personal data are stored for a period of 5 (five) years upon the termination of the traineeship.
For further processing envisaged beyond the original retention period for historical, statistical or scientific purposes, please specify whether the personal data will be anonymised: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Technical & organisational security measures taken
Several technical and organisational measures have been adopted in order to ensure the optimum security of the documents and personal data collected in the context of the procedures described under section II a).