



EIOPA- 15/325-Rev 2

**Record of personal data processing
related to Invigilated Remote Written Testing
(Art.31(5) Regulation (EU)1725/2018¹)**

EIOPA's Data Controller

The controller responsible for the processing is EIOPA's Executive Director.

Address and email address of the controller:

Westhafenplatz 1, 60327 Frankfurt am Main, Germany

fausto.parente@eiopa.europa.eu

EIOPA's Data Protection Officer

Westhafenplatz 1, 60327 Frankfurt am Main, Germany

dpo@eiopa.europa.eu

External Processor(s) / Joint Controller(s)

TestReach: external contractor providing test remote invigilation services

Purpose of the processing

The recruitment process has been impacted by the COVID- 19 outbreak.

Taking all the necessary precautions against the Coronavirus, in particular by avoiding meetings with external participants (including candidates), EIOPA amended its recruitment process by rolling out remote written tests instead of the standard ones carried out at EIOPA premises.

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

Categories of data subjects & Personal data collected

TestReach receives from EIOPA HR only the names of the shortlisted candidates and their contact details (e-mail, phone number).

TestReach (invigilator) asks the candidate at the identity verification stage (at the beginning of the invigilated test) to show his/her ID card so that the invigilator compares the name on the ID with the name provided by EIOPA HR and verifies the identity of the candidate.

TestReach anonymises the candidates' answers and send the anonymised test answers to EIOPA HR, together with a decoding file to match the anonymised tests with the respective candidates, which is to be used by EIOPA at a later stage in line with its recruitment practices.

Test Reach (invigilator) also monitors the candidate during the test and record this by video.

EIOPA HR receives from TestReach:

- The individual anonymised test answers of each candidate as a result of the invigilated remote testing (pdf and excel spreadsheet (if applicable)) – after each invigilated remote test;
- Decoding file to match the anonymized tests with the respective candidates – after each invigilated remote test;
- Report on the execution of the remote written test, e.g. notification of any issues that have arisen during the test - after each invigilated remote test;
- Video records of invigilated remote written tests (upon request by EIOPA).

Recipients of personal data

The recipients of the personal data processed might be the following:

- Designated EIOPA staff members.
- External Contractor – Data Processor (TestReach).
- External lawyers, where necessary.
- The Internal Audit Service, the European Ombudsman, the Civil Service Tribunal and the European Data Protection Supervisor.

Transfer of personal data to a third country or international organisation. If so, to which ones and with which safeguards?

No personal data are sent to a third country or an international organisation in the context of this processing activity.

Retention period

For EIOPA:

For successful candidates on the Reserve List: Data collected for the Invigilated Remote Testing (remote written tests answers) are stored in the recruitment file for a period of five years after the closing of the recruitment campaign. In case of a legal challenge, this date shall be extended until two years after completion of all relevant proceedings.

For unsuccessful candidates who have not been retained for the Reserve List: Data collected for the Invigilated Remote Testing (remote written tests answers) can be kept until all appeal channels have been exhausted, incl. the time limits for appeal before the General Court of the Court of Justice of the European Union.

Invigilation Reports received will be retained in the relevant recruitment file for a period of five years after the closing of the recruitment campaign. In case of a legal challenge, this date shall be extended until two years after completion of all relevant proceedings.

Video records received will be retained in the relevant recruitment file until all appeal channels have been exhausted, incl. the time limits for appeal before the General Court of the Court of Justice of the European Union.

For the processor (TestReach):

EIOPA is the Data Controller and is responsible for the length of time during which personal information is retained. TestReach as Processor acts in accordance with the Data Controller's instructions and in compliance with the Regulation.

TestReach shall anonymise all personal data processed, with the exception of the video data and the Invigilation Reports, at the acknowledgement by EIOPA of receipt of the Investigation Reports and remote written tests answers.

All video records and Invigilation Reports are held by TestReach for a period of 6 months after which they are deleted.

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 invigilated remote testing both by EIOPA and the provider. More precisely:

For EIOPA:

- Electronic files are stored in EIOPA's document management system with restricted access rights;
- Additional measures such as pseudonymisation and encryption, back-ups, audit trails are also implemented.

For the processor:

Application architecture - secure multi-tenant system with auto-scaling, hot failover and multiple redundant systems at all levels of the application infrastructure; certification under ISO 27001 as complying with the highest standards of data and system security (expired in April 2020, currently being in process of renewal); the application, backups and all other TestReach data is held within Amazon's secure data cloud (AWS) within the EU, with primary servers in Dublin and back-up servers in Frankfurt; All TestReach data is held in the EU and is subject to EU data protection and processing laws, and all data is encrypted using 128-bit encryption and SSL.

Information on how to exercise data subject's rights

Data subjects may exercise the data privacy rights provided in Articles 17 to 24 of the Regulation (EU) 1725/2018.

To exercise these rights, please contact: recruitment@eiopa.europa.eu or DPO@eiopa.europa.eu.

For more information on the processing of personal data and on how to exercise the above rights, please refer to EIOPA's Legal Notice:

https://www.eiopa.europa.eu/legal-notice_en#PersonalDataProtection