



## Data Protection Notice for Internal Job Shadowing

The European Health and Digital Executive Agency (HaDEA) processes your personal data<sup>1</sup> in line with [Regulation \(EU\) 2018/1725 of the European Parliament and of the Council of 23 October 2018](#)<sup>2</sup> on the protection of personal data by the European Union's institutions, bodies and agencies and on the free movement of such data.

### What is the purpose(s) of this processing activity?

**The purpose** of this processing is to launch and facilitate the internal Job shadowing exercises which will be designated as a HaDEA learning activity, overseen by the HaDEA People Development team. The programmes aim to provide HaDEA staff and Blue Book trainees with a deeper understanding of the roles within various job profiles and insights into the responsibilities of their peers in different units, services, and programmes.

In practice, the aim is to allow a “guest” staff member/Blue Book trainee from one Unit/Sector to do a Job shadowing with a “host” staff member/Blue Book trainee from another Unit/Sector. Staff members interested to participate in a Job shadowing exercise will apply via EU Survey.

The purpose of the processing is therefore to collect the interests of staff members willing to participate in the Job shadowing exercises, to process requests by identifying colleagues in the hosting Unit/Sector willing to receive a “guest” staff member/Blue Book trainee and to manage the Job shadowing exercise during the period when this exercise takes place. Approval from both line managers/advisers in the guest’s unit and the hosting Unit is necessary. Authorisations are obtained via email.

Following the Job shadowing exercise for staff members, an anonymous assessment questionnaire will be used for evaluation in EU Learn.

### Who is the data controller?

**The data controller** of the processing operation is the Head of Unit C.3 Staff, Communication and Support of HaDEA.

The **following entity processes** your personal data on our behalf:

The European Commission Directorate-General for Human Resources Unit HR.C.4 that hosts the following tools:

- EU Survey: please see a [link to the privacy statement](#);
- EU Learn: please see a [link to the privacy statement](#).

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<sup>1</sup> **Personal data** shall mean any information relating to an identified or identifiable natural person (‘data subject’). An identifiable natural person is one 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 of that natural person.

<sup>2</sup> 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 (OJ L295/39 of 21.11.2018).

## **Which personal data is collected?**

The following of your personal data are processed:

- Name, surname and professional contact details of the participants: “guest” and “host” staff members;
- Motivation to apply, learning goals (skills and competences), professional experience, area/profile/function of the staff members applying to job shadowing.

## **Who has access to the personal data of data subjects and to whom can they be disclosed?**

**The recipients** of your personal data will be:

### **A. WITHIN THE AGENCY:**

- a. Authorised staff in the People Development team of HaDEA;
- b. The Blue Book trainee’s adviser and the Blue Book Coordinator in case Blue Book trainees take part in the Job shadowing exercise;
- c. The hierarchical superiors of the “guest” and “host” staff member in their respective Unit/Sector will have to give their prior consent to the participation of their staff member in the Job shadowing;
- d. “Guest” and “host” staff members have access to relevant personal data of each other.

### **B. OUTSIDE THE AGENCY:**

On a need-to-know basis and in compliance with the relevant current legislation, bodies charged with monitoring or inspection tasks in application of EU law, e.g. EC Internal Audit Service, Court of Auditors, European Anti-fraud Office (OLAF), the European Ombudsman, the European Data Protection Supervisor (EDPS), the European Public Prosecutor.

Your personal data **will not be transferred** to third countries or international organisations.

The processing of your personal data will **not include automated decision-making** (such as profiling).

## **Which is the legal basis for processing your personal data?**

We process your personal data on the basis of Article 5(1)(a) of Regulation 2018/1725, because processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body. To the extent that processing of personal data is based on your consent, such processing is lawful also under Article 5(1)(d) of Regulation 2018/1725.

**The legal bases** for the processing activities are the following:

- Article 24a of the Staff Regulations (SR) and Articles 11 and 81 of the Conditions of Employment of Other Servants of the European Union (CEOS)<sup>3</sup>;

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<sup>3</sup> Staff Regulations of Officials of the European Union (hereinafter ‘Staff Regulations’) and Conditions of Employment of Other Servants of the European Union (hereinafter ‘CEOS’), laid down by Council Regulation (EEC, Euratom, ECSC) No 259/68, OJ L 56, 4.3.1968, p. 1, as last amended by Regulation (EU, Euratom) No 1023/2013 of the European Parliament and of the Council of 22 October 2013, OJ L 287, 29.10.2013, p. 15.

- Communication to the Commission on Learning and Development Strategy of the European Commission of 24/06/2016<sup>4</sup>;
- HaDEA Steering Committee Decision of 26 February 2021<sup>5</sup> on the application by analogy of Commission Decision C(2016)3828 of 24/06/2016 on the implementation of the learning and development strategy of the European Commission.

### **How long do we keep your personal data?**

Personal data are kept for 4 years after the end of the Job shadowing exercise.

The retention periods provided in EU Learn and EU Survey will also apply (please refer to the above-mentioned privacy statements for more information).

### **What are your rights regarding your personal data?**

**You have the right** to access your personal data and to request your personal data to be rectified, if the personal data is inaccurate or incomplete; where applicable, you have the right to request restriction or to object to processing, to request a copy or erasure of your personal data held by the data controller. If processing is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on your consent before its withdrawal.

Your request to exercise one of the above rights will be dealt with without undue delay and within **one month**.

If you have **any queries** concerning the processing of your personal data, you may address them to the Head of Unit C.3 (entity acting as data controller) via e-mail to [HADEA-PEOPLE@ec.europa.eu](mailto:HADEA-PEOPLE@ec.europa.eu) or to HaDEA Data Protection Officer at [HADEA-DPO@ec.europa.eu](mailto:HADEA-DPO@ec.europa.eu).

**You shall have right** of recourse to the European Data Protection Supervisor at <https://edps.europa.eu>.

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<sup>4</sup> Ref. number: C(2016)3829.

<sup>5</sup> Ref. number: SC01(2021)06.

