



Data Protection Notice for Career Guidance Services

The European Health and Digital Executive Agency (HaDEA) processes your personal data¹ in line with [Regulation \(EU\) 2018/1725 of the European Parliament and of the Council of 23 October 2018²](#) 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 of the processing activity?

The purpose(s) of this processing activity is to provide HaDEA staff with voluntary career guidance services and related support.

Career Guidance Officers (“CGO”) offer support to staff, notably, in:

- Career talk;
- Job search support;
- Reviewing job application;
- Interview preparation.

An internal IT Tool serves to facilitate staff members in scheduling meetings with CGOs and uploading relevant documentation. Any uploaded documents are accessible solely to the CGO with whom the staff member has a scheduled meeting.

As part of the career guidance services, the CGOs may invite staff members to fill in an online questionnaire managed by PerformanSe. In the questionnaire, the staff members answer a series of questions pertaining to their cognitive and behavior characteristics. Based on the replies, PerformanSe’s algorithm creates a report assessing their soft skills and managerial potential. The report is provided to the assessed staff member and the CGO, who reviews the report with the staff member.

PerformanSe also holds the personal data of the CGOs who serve as a contact point between HaDEA and the staff member using the PerformanSe services. PerformanSe uses the CGO’s personal data to provide them with secure and personal access to PerformanSe’s on-line tool and send them messages, such as notices of completion.

Who is the data controller?

The data controller of the processing operation is the Head of Unit C3 “Staff, Communication and Support” of HaDEA.

When staff members use the PerformanSe on-line tool, PerformanSe processes personal data, on behalf of HaDEA, acting, as processor, in line with this Data Protection Notice and with the dedicated Data Protection Agreement. PerformanSe can be contacted via dpo@performanse.com.

Which personal data is collected?

The following of your personal data will be collected and processed:

¹ 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.

² 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).

- The following data are extracted from SYSPER and inserted automatically in the career guidance file:

Personal data related to the administrative situation of the staff member: first name, surname; personnel number, phone number, gender, age, entry date to HaDEA, employment type, grade, type of post, sector/unit, professional address, job position/job title, area of expertise.

- In addition, the following data are processed during the Career Guidance (CG) procedure:
 - Professional e-mail address;
 - The name of the Agency to which the staff member concerned belongs;
 - Date of session with the CGO and attendees (in case of presence of other CGOs) and type of session (in person, telephone, email exchange, online meeting);
 - Subject of the discussion (personal history, professional background/career history, professional profile, competencies/skills, weaknesses, aspirations (including mobility aspirations), motivation, career plan, professional needs, work preferences, ability analysis, information related to the current job and the working environment, qualifications and educational background, knowledge of languages, interests and values, other relevant information and data provided by data subjects in the open field questions);
 - CGO support given: any personal data provided during the CG support sessions.

As regards the internal IT tool, the following personal data will be processed:

- First name, surname of the staff member and the CGO;
- EU Login ;
- E-mail address of the staff member and the CGO;
- Organisation of the CGO and of the staff member requesting the career guidance service (customer);
- Date of session with the CGO and attendees and type of sessions (in person, online meeting);
- Category of session (career talk, job search support, reviewing job application, interview preparation, etc);

Other categories of personal data (such as CV) may be uploaded in the internal IT Tool at the discretion of the staff member concerned.

- Personal data provided by the HaDEA staff member when using PerformanSe:
 - I) HaDEA staff members being assessed: title, name, surname, e-mail address, language, nationality, job title and responses provided in replying to a series of questions pertaining to their cognitive and behavioral characteristics.
 - II) Statistics optional data: Age, level of education, function, section of activity, level of managerial responsibilities (if applicable);
 - III) CGOs: First name, surname, title, language, email address, employer, personal log-in into the PerformanSe platform, password, log-in data, transaction logs (list of actions performed), and IP address.

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:

- The CGOs and back up colleagues when needed;
- Authorised staff from PerformanSe;
- HaDEA staff as regards the contact details of the CGO.

Also, if need be, access will be given to:

- HaDEA's Data Protection Officer, authorised staff from the Legal Affairs Sector in case of relevant proceedings;
- In addition, personal data may be shared with and processed by the bodies charged with a monitoring or inspection task in application of Union law in compliance with the applicable data protection rules and within the scope of their tasks entrusted by the relevant legislation.

This includes, in particular, the following recipients:

- o Bodies in charge of a monitoring or an inspection task in application of Union law (e.g. Internal audit service (IAS), Court of Auditors, etc.);
- o The European Court of Justice or a national judge as well as the lawyers and the agents of the parties in case of a legal procedure;
- o OLAF in case of an investigation conducted in application of Regulation (EC) No 1073/1999;
- o The European Ombudsman within the scope of the tasks entrusted to it by Article 228 of the Treaty on the Functioning of the European Union;
- o The European Data Protection Supervisor in accordance with Article 58 of Regulation (EC) 2018/1725;
- o The European Public Prosecutor's Office within the scope of Article 4 of Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office.

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?

Lawfulness of the processing: The processing of your personal data is lawful under Article 5(1)(d) of Regulation (EU) 2018/1725 as such processing is based on your consent.

How long do we keep your personal data?

Name and email of the staff member and the CGO, as well as the CV or other data provided by the staff member when booking the session are kept for two years unless the staff member concerned indicates that they want them deleted at an earlier stage. The name of the organisation of the staff requesting the career guidance service, date of session, type of session and number of sessions will be kept for statistical purposes.

Personal data that will be processed by PerformanSe will be kept for up to one (1) year. Specifically:

- Archived data will be kept for 12 months;
- Functional traces for 6 months;
- Technical journals (logs) for 6 months.

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 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 contact the Head of Unit C.3 (entity acting as data controller) via mail to HaDEA-People-Development@ec.europa.eu and HaDEA Data Protection Officer at HADEA-DPO@ec.europa.eu.

You shall have the right of recourse at any time to the European Data Protection Supervisor at EDPS@edps.europa.eu.

Version June 2025