Ref. Ares(2026)7242938 - 22/07/2026

DATA PROTECTION NOTICE FOR JOINT SELECTION AND RECRUITMENT PROCEDURES OF TEMPORARY AGENTS AND CONTRACT AGENTS

The European Health and Digital Executive Agency ('HaDEA') processes your personal data[1] in line with Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018[2] 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 THIS PROCESSING ACTIVITY?

The purpose is to receive applications, evaluate and select the best candidates for Temporary Agents and Contract Agents positions available in HaDEA and in the Executive Agencies participating in the joint inter-agency selection.

This processing aims at ensuring compliance with all requirements and proper management of selection procedures conducted by HaDEA when acting as lead agency or when acting as a participating agency in the joint inter-Agency selection. The participating agencies will be clearly identified in the Vacancy Notice. The processing in the context of the joint inter-Agency selections concerns only the selection phase until the establishment of reserve lists.

For each selection a "selection file" is created by the lead agency that contains all documents related to this specific selection procedure such as CVs and motivation letters of candidates, the Selection Committee appointment, declaration of confidentiality and absence of conflict of interest, minutes of the Selection Committee meetings, evaluation grids of candidates.

The reserve lists are kept and managed by the lead Agency and shared as appropriate with the participating Agencies. The subsequent recruitment processes are managed by each agency and subject to own and specific data protection record and notice.

More information on the processing of the personal data for the recruitment phase in HaDEA can be found here.

Besides the above, reserve lists of successful candidates and their personal data are shared among Executive Agencies that do not participate in the joint selection procedure pursuant to the Memorandum of Understanding (MoU) for the sharing of reserve lists ('The Memorandum')[3]. In line with this Memorandum, the Executive Agencies upload

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[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).

[3] Memorandum of Understanding concerning the modalities and procedures of interaction between the Executive Agencies on the sharing of Reserve lists (Ares(2022)8128318).

reserve lists onto a common repository form which candidates may be identified and recruited.

The sub-processor, TestReach, may process personal data of candidates with the purpose of organising and invigilating online written tests within the framework of online selection procedures, which may be organised by HaDEA for Temporary Agent 2(f) selections and, where needed, for other kind of contracts. In particular, the sub-processor provides a cloud-based Software-as-a-Service solution used to create, deliver and mark any type of assessment. To take an exam on TestReach platform, the candidates will download and use the TestReach application.

Inasoft, who provides an e-recruitment tool (GestMax), may process personal data of candidates with the purpose of organising selections, including publication of vacancy notices, collection of applications and documents submitted by candidates, management of applications for selection and recruitment purposes, general communication with candidates until the announcement of results, interview scheduling, and potentially supporting screening of applications.

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 Executive Agencies participating in this type of selection act as joint controllers and are specified in the relevant vacancy notice.

European Commission, Directorate General for Human Resources and Security (DG HR), Unit B.1, processes personal data (as data processor) on behalf of HaDEA as manager of EUCV-Online, the e-Recruitment tool used to process applications (the Privacy statement is available here). The processor can be reached via HR-MAIL-B1@ec.europa.eu. More information regarding the processing of personal data related to medical visits can be found on HaDEA's website.

In case HaDEA acts as lead agency in a joint inter-agency selection procedure for temporary agents, it may use the following external contractors for the organisation of online written tests and for their invigilation:

- Processor: Kioskemploi Ad-Rh Admen Inasoft (Inasoft), 2507 avenue de l'europe, Rillieux la pape, France, that provides an e-recruitment tool (Gestmax) to run selections.

In case of online written test invigilation.

- Processor: SoftwareONE BE BV, Esplanade 1, Suite 315, Box 3, B-1020 Brussels.
- Sub-processor: TestReach Ltd, 9-10 NexusUCD, Belfield Office Park, Clonskeagh, Dublin 4, Ireland, D04 V2N9.

Other external service providers might be engaged as well, in which case they will be indicated in the relevant Data Protection Notice.

WHICH PERSONAL DATA IS COLLECTED?

Personal data allowing to identify the candidate, i.e. surname, first name, date of birth, gender, identification document (ID), nationality;
• Information to allow the practical organisation of preselection and other tests, if any, i.e. address information: street, postcode, town, country, telephone, email;
• Information to verify whether the candidate fulfils the eligibility and selection criteria laid down in the vacancy notice, i.e. nationality, languages, education, employment record, professional experience, military/civil service record, other relevant for the job skills such as knowledge of computer software, references (contact details of referees or performance reports);
• Information about the length of the legal notice period required, periods spent abroad, motivation, declaration of honour as well as where the vacancy notice was found;
• Outcome of EPSO CAST results (for candidates for Contract Agent posts) and supplementary forms of evaluation carried out by the Agency (e.g. written tests);
• Results of the oral tests/interviews, if applicable;
• Identification data of the members of the Selection panels;
• Information regarding criminal records;
• Medical data in the context of the pre-employment medical visit of candidates who received a job offer and accepted it;
• Information about disability might be requested in order to facilitate the access of the candidate to the HaDEA premises and to adapt the space for the interviews and tests.
• Bank account details (Financial Identification form) – for candidates invited for an interview and pre-employment medical visit having the right to be reimbursed;
• In addition, for candidates who already work(ed) for EU Institutions HaDEA may also consult the Sysper profile in order to check information relevant to assess the application against the vacancy notice, such as probationary period, confirmation of grade, etc.

• The following personal may be processed by Inasoft, including via GestMax:

i) Identification data of candidates: First and last name, identification document, nationality, date of birth, place of birth, gender.

ii) The application/CV of candidates might include the following data: E-mail address, home address, phone number, social media profile, civil status, employment history, education history, languages spoken, any other type of personal data provided by candidates.

iii) Sensitive data processed: Candidates might disclose sensitive personal data such as data related to disabilities and their health condition in their application/CV.

• Sensitive data processed by Inasoft: Candidates might disclose sensitive personal data such as data related to disabilities and their health condition in their application/CV
• With regard to the invigilation activity on online written tests carried out by TestReach, depending on the type of exam being taken, different information will be collected/stored by TestReach, including:

i. Exam Candidate Personal Information – this information is used to identify the candidate, to ensure they take the correct exam and to ensure their specific exam requirements are met. It may include: ID, name, email address, phone, demographic information, special adjustments for the exam (for example, additional time allowed). The candidate will be asked to present approved photographic ID at the beginning of the exam session on the camera and this is reviewed by the TestReach supervisor; they do not need to send their IDs in advance of the exam. When the written scripts are supplied for marking, they will be identified only by a candidate number, not by names or emails, so they

will be anonymous for correctors. At the end of the process, each candidate number is matched with the name of the candidate to calculate the final score of the selection process.

ii. Computer Information – this information is used to maintain the integrity of the test, to investigate and resolve any issues that may arise (e.g. the Desktop App will check that the camera, microphone, screenshare and internet connection are all sufficient to take the exam. It could also detect if the computer has two monitors and block candidates from using the second monitor to perform activities outside of the exam. The App would detect any applications running in background on the candidate's computer to prevent the use of screen recording applications) and to help TestReach improve the service offered. It may include: IP address, browser header data (user agent), processes running, RAM & CPU usage statistics, installed drivers, peripherals connected and cookies used.

iii. Candidate Exam Information – it includes video, audio, remote screenshare and related recording, responses given, score, results data, access and activity data. As the TestReach application has an automatic video buffering, the candidate taking an exam is viewed via video, audio and remote screenshare, and a temporary recording (deleted within 9 months) is taken of the session. Data collected during the invigilation service carried out by TestReach is stored within AWS (Amazon Web Services) and either: (1) it is written to a database (Mongo DB) – this is typically answers to questions, first name, last name, as a record of the actual exam or (2) it is written to various transaction log files – this is typically transaction information, such as when they logged in, when they logged out, when they navigated to a new question, etc. to ensure robust experience (transactions are logged in various places to ensure the integrity of the data, to allow it to be fully recovered if something happens, for audit-trailing purposes, and to assist with trouble-shooting).

Candidates may spontaneously reveal further types of data not enumerated in the Data Protection Notice. However, HaDEA does not actively request or collect data other than what is listed in the Data Protection Notice.

WHO HAS ACCESS TO THE PERSONAL DATA OF DATA SUBJECTS AND TO WHOM CAN THEY BE DISCLOSED?

The recipients to whom the personal data will or might be disclosed are:

• Authorised staff in charge of selections from HaDEA People Sector (HR) and the HR Sectors in the Executive Agencies participating in the joint inter-Agency selection procedures;
• Members of the Selection Committee;
• Authorised staff of the competent HaDEA Financial support and control Unit (for the purpose of reimbursement of travel costs related to medical exams);
• Heads of Departments and the recruiting service in HaDEA and the Executive Agencies that participate in the joint inter-Agency selection procedures;
• (Deputy) Head of Unit C.3; HaDEA and Head of HR sector on a need to know basis
• Authority empowered to conclude contracts of employment in HaDEA and the Executive Agencies participating in the joint inter-Agency selection procedures;
• The Executive Agencies according to the MoU for the sharing of reserve lists;
• CVs of candidates may be shared with Joint Undertakings upon receipt of a relevant request and only with the explicit consent of the candidates;

• Authorised staff of DG HR of the European Commission;
• Authorised staff of EPSO as regards the results of CAST tests;
• TestReach authorised staff (as regards the written tests for temporary agent positions).
• Inasoft authorised staff (as regard to the use of the GESTMAX tool to run selections.
Also, if need be, access will be given to:
• HaDEA's or the Executive Agencies' (participating in the joint inter-Agency selection procedures) Data Protection Officer and authorised staff from the Legal 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:

- 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.);
- 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;
- OLAF in case of an investigation conducted in application of Regulation (EC) No 1073/1999;
- 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;
- The European Data Protection Supervisor in accordance with Article 58 of Regulation (EC) 2018/1725;

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.

The transmission will be restricted to the information necessary for the competent entity to carry out its task.

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

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

WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

We process your personal data on the basis of Article 5(1) (a) and (b) of Regulation (EU) No 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 for the management and functioning of the Union Institutions or bodies as well as for compliance with a legal obligation to which the controller is subject.

The legal bases for the processing are the following:

- Council Regulation (EC) No 58/2003 of 19 December 2002 laying down the statute for Executive Agencies to be entrusted with certain tasks in the

management of Community programmes[4];

- Commission Implementing Decision (EU) 2021/173 of 12 February 2021 establishing the European Health and Digital Executive Agency, the European Climate, Infrastructure and Environment Executive Agency, the European Research Executive Agency, the European Innovation Council and SMEs Executive Agency, the European Research Council Executive Agency, and the European Education and Culture Executive Agency and repealing Implementing Decisions 2013/801/EU, 2013/771/EU, 2013/778/EU, 2013/779/EU, 2013/776/EU and 2013/770/EU[5];
- Articles 12-15 and 82-84 of the Conditions for Employment of Other Servants of the European Union (CEOS)[6];
- Steering Committee Decision SC01(2021)07 laying down general implementing provisions on the procedure governing the engagement and use of temporary staff under Article 2(f) of the Conditions of Employment of Other Servants of the European Union;
- Steering Committee Decision SC01(2021)06 on the application by analogy of the Implementing Rules of the Staff Regulations adopted by the Commission[7].

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 (EU) 2018/1725.

Furthermore, when it comes to the processing of special categories of personal data, the processing operation is lawful under Article 10(2)(a) of the Regulation (EU) 2018/1725 provided data subjects have given prior explicit consent.

For reserve lists established before the MoU between the Executive Agencies on the sharing of reserve lists, explicit consent from data subjects will be requested for inclusion in the common repository. The consent will be requested and collected by the data controller via an exchange of emails. In case where the data subject does not consent, or does not reply, their personal data will not be shared with other Executive Agencies.

For selection procedures launched after that MoU, data subjects are informed of the processing operation in the vacancy notice. They will then have the opportunity to inform HaDEA if they wish to opt out of their data being shared among the Executive Agencies.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

The time limits for keeping the data are the following:

- Files documenting the organization of selection procedures will be kept for a maximum period of 5 years after the establishment of the reserve list.
- Files on candidates for posts as contract or temporary staff who were not retained will be kept for a maximum period of 5 years after the establishment of the reserve list.
- Should the candidate be recruited, then their personal data will be retained for 8

[4] OJ L 11, 16.1.2003, p. 1–8.
[5] OJ L 50, 15.2.2021, p. 9–28.
[6] 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.
[7] Specifically of the Commission Decision C(2017) 6760 of 16/10/2017 on Employment of contract staff.

years after the extinction of all rights of the person concerned and of any dependants, and for at least 100 years after the recruitment of the person.

- Personal data of candidates entered on a reserve list shall be kept for a maximum period of 2 years after the expiration of the reserve list.
- Personal data on reserve lists will be shared among the Executive Agencies until the date of expiration of the specific reserve list.
- Personal data will be kept by TestReach for a maximum period of 9 months from the day of the exam.
- As regards the retention period related to data processed by Inasoft: Data is automatically deleted after two years of inactivity of a user.

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 or wish to exercise any of the rights described above, you contact the Head of Unit C.3 via HADEA-TALENT-SELECTION@ec.europa.eu and HaDEA DPO HADEA-DPO@ec.europa.eu.

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

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