Ref. Ares(2025)4550652 - 06/06/2025

RECORD OF PERSONAL DATA PROCESSING ACTIVITY

Record No: HR.06 **Initial approval by Data Controller**: ARES registration date

Update (s) *(if applicable):* N/A

NAME OF THE PROCESSING ACTIVITY

Career Guidance Services

IDENTIFICATION OF THE DATA CONTROLLER

European Health and Digital Executive Agency (HaDEA), Head of Unit C.3 Staff, Communication and Support

GROUND FOR THIS RECORD

□ Record of a new type of processing activity of personal data (before its implementation)
X **Record of a processing activity of personal data that is already in place**
□ Change/Amendment/ Update of an already existing previous record

1. INFORMATION ON THE PROCESSING ACTIVITY of Career Guidance services

This processing activity is performed in accordance with **Regulation (EU) No 2018/1725** ([1]) on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

1.1. The Data Controller is:

The Head of Unit C.3 Staff, Communication and Support in the European Health and Digital Executive Agency (HaDEA), Place Charles Rogier 16, B-1049 Brussels, BELGIUM; can be contacted at HADEA-PEOPLE@ec.europa.eu.

1.2 The contact details of the Data Protection Officer (DPO)

HADEA-DPO@ec.europa.eu

1.3 Joint controller:

N/A

1.4 The following entity(ies) is/are acting as Processor(s):

When staff members use the PerformanSe on-line tool, PerfornanSe 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.

1.5 Description and purpose(s) of this processing:

The purposes 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

([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 (OJ L 295/39 of 21.11.2018).

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.

1.6 The legal basis for the processing based on Article 5(1) of Regulation (EU) 2018/1725 is/are:

☐ **(a)** the 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 laid down in Union law;

☐ **(a2**) the processing is necessary for the **management and functioning** of the Union Institutions, bodies or agencies (Recital (22) of Regulation (EU) 2018/1725) laid down in Union law;

☐ **(b)** the processing is necessary for **compliance with a legal obligation** to which the controller is subject, which are laid down in Union law;

☐ **(c**) the processing is necessary 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;

☒ **(d)** the data subject has given **consent** to the processing of his or her personal data for one or more specific purposes;

☐ **(e**) the processing is necessary in order to protect the **vital interests** of the data subject or of another natural person.

1.7 The categories of data subjects

☒ Agency staff (Contractual and temporary staff in active position)

☐ Applicants

☐ Relatives of the data subject

☐ Complainants, correspondents and enquirers

☐ Witnesses

☐ Beneficiaries

☐ External experts

☐ Contractors

☒ Other, please specify: CGOs. Moreover, staff from other Executive Agencies might use the HaDEA IT tool based on a Data Processing Agreement with HaDEA.

1.8 Categories of personal data

a) Categories of personal data:

The following personal data will be collected and processed:

- 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.

b) Categories of personal data processing likely to present <u>specific risks:</u>
Not applicable

c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):
HaDEA might process special categories of personal data, such as sensitive data, in case staff members wish to disclose this type of data.

d) Specify any additional data or explanatory information on the data being processed, if any:
N/A

1.9 Retention period (maximum time limit for keeping the 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.

Is any further processing for historical, statistical or scientific purposes envisaged?
☒ yes, ☐ no

1.10 The recipient(s) of the data

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

- 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.

1.11 Transfers of personal data to third countries or international organisations

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

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

1.13 Description of security measures

The following technical and organisational security measures are in place to safeguard the processing of this personal data:
The European Commission's IT systems used by the Agency abide by the Commission's security guidelines. The Agency complies with Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

1. Organisational measures:

A Corporate Local Informatics Security Officer (C-LISO) is in place. Its role includes supervising the Agency compliance with the relevant regulations, and the application of security measures recommend by DIGIT.

Organisational measures include appropriate access rights and access control. As a rule within the Agency, access to information systems, the file system or offices are subject to a series of authorisations where the person granting the access is different from the person requesting or authorising the access - except in limited cases of delegation.

The (HR) responsible person collects and places the documents on the secured drives of the Commission and all Agency staff are bound by a confidentiality obligation.

The need-to-know principle applies in all cases.

2. Technical measures
State of the art technical cybersecurity measures are implemented in the corporate systems, according to the security needs. Those measures are in constant evolution.

1.14 Data protection Notice

Data Subjects are informed on the processing of their personal data via a **data protection notice on their rights:**
- to access their personal data held by a controller;
- to request their personal data held by a controller to be corrected;
- to obtain in some situations erasure of their personal data held by a controller, e.g. when data are held unlawfully (right to be forgotten);
- to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- **of recourse** at any time to the **HaDEA Data Protection Officer** at HADEA-DPO@ec.europa.eu and to the **European Data Protection Supervisor** at https://edps.europa.eu.

Request from a data subject to exercise a right will be dealt within **one month**.

The right to information, access, rectification, erasure, restriction or objection to processing, communication of a personal data breach or confidentiality of electronic communications may be restricted only under certain specific conditions as set out in the **applicable Restriction Decision** in accordance with Article 25 of Regulation EU 2018/1725.

Electronically signed on 05/06/2025 16:03 (UTC+02) in accordance with Article 11 of Commission Decision (EU) 2021/2121