



RECORD OF PERSONAL DATA PROCESSING ACTIVITY

Record No: HR.02 **Initial approval by Data Controller:** ARES registration date

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

NAME OF THE PROCESSING ACTIVITY

Selection and management of Blue Book trainees

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)
- Record of a processing activity of personal data that is already in place**
- Change/Amendment/ Update of an already existing previous record

INFORMATION ON THE PROCESSING ACTIVITY of Selection and management of Blue Book trainees

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:

European Commission (the Traineeships Office) is joint controller for selection and overall management of the Traineeships scheme including recruiting trainees via the European Commission's IT platform GestMax.

The contact details of the joint controller is: EC-Traineeships-Office@ec.europa.eu

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

Not Applicable

1.5 Description and purpose(s) of this processing:

Each year HaDEA offers five-month paid traineeships to trainees selected via GestMax. The European Traineeship Office (Website: <http://ec.europa.eu/stages/>) is responsible for the pre-selection of candidates to be included in GestMax. Personal data of candidates are collected and stored under the responsibility of the European Traineeship Office. The dedicated data protection record (DPR-EC-11147.1) can be consulted [here](#) and the privacy statement [here](#).

HaDEA has signed with the European Commission a Service Level Agreement² which governs the Agency's access to the European Commission's traineeship scheme. Data processing by HaDEA concerns only the selection of trainees from GestMax and the daily management of recruited trainees during their traineeship at the Agency.

The purpose of this processing is to:

- identify potential trainees for the Agency from the preselected candidates included in the Commission's IT platform (GestMax), select, recruit and evaluate them;
- manage their files during the traineeship in HaDEA;

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).

² Ares(2021)3121677), amended by Ares(2023)2909801.

- prepare the appropriate IT and technical environment, including relevant access rights, in relation with their tasks; and
- grant them access rights to the HaDEA building.

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 body³ 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.

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.

1.7 The categories of data subjects

- Agency staff (Contractual and temporary staff in active position)
- Visitors to the Agency
- Applicants
- Relatives of the data subject
- Complainants, correspondents and enquirers
- Witnesses
- Beneficiaries
- External experts
- Contractors
- Other, please specify: HaDEA Blue Book trainees.

³ [Commission Implementing Decision](#) (EU) 2021/173 of 12 February 2021 establishing the European Climate, Infrastructure and Environment Executive Agency, the European Health and Digital 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
 Rules governing the official traineeships scheme of the European Commission ([Commission Decision](#) of 2 March 2005 - C(2005)458).
 The Service Level Agreement signed between the Traineeship Office and HaDEA (Ares(2021)3121677), amended by Ares(2023)2909801)

1.8 Categories of personal data

a) *Categories of personal data:*

The following of your personal data are processed:

- Data subject's identification included in Gestmax: surname, first name, number of a candidate, date of birth, place of birth, country of birth, gender, nationality, marital (civil) status, phone number and email address;
- Data subject's career: CV, education, training experiences, previous professional experiences, language knowledge, hard and soft skills, motivation letter;
- Contract and its implementation: traineeship period, leave and absence;
- Professional contact details: email address, phone number, surname, first name, middle name(s) maiden name, permanent address and emergency contact information;
- Information about disability might be provided in order to facilitate the access of the candidate to the HaDEA premises and adapt the working space.

b) *Categories of personal data processing likely to present specific risks:*

Not applicable

c) *Categories of personal data whose processing is prohibited, with exceptions (art. 10):*

In case of sick leave: trainees should notify their Adviser. If the absence is longer than 2 days, trainees must also upload a medical certificate on the Blue Book account.

In the event of a disability necessitating special logistical or workplace conditions, the Workplace Sector of HaDEA will be informed about the need for special arrangements.

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

Not applicable

1.9 Retention period (maximum time limit for keeping the personal data)

The personal data concerned **will be kept for a maximum period** of 5 years⁴ for the candidates selected for traineeships and 2 years for the non-selected candidates, counted as from the end of the stage period. Data will be deleted at the end of this period, except the sheet for the reconstruction of one's career which is kept for 50 years.

All personal data of Blue Book trainees are collected and processed by the European Traineeships Office. A specific privacy statement regarding the retention period of different categories of personal data can be found [here](#).

Spontaneous applications are not kept by HaDEA and are immediately deleted.

⁴ The retention period should be decided in accordance with the Commission's [common retention list](#)

Special categories of personal data: in the event of a disability, the relevant data will be deleted once the special arrangements are in place.

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:

A. WITHIN THE AGENCY:

- a. Authorised staff in the People (HR) Sector of HaDEA;
- b. The trainee's advisors;
- c. The Head of the relevant Unit, Sector and Department;
- d. The Director of HaDEA.
- e. In the event of a disability necessitating special logistical or workplace conditions, authorised staff in the Workplace Sector of HaDEA.

B. OUTSIDE THE AGENCY:

- In case of audits or proceedings, etc., HaDEA's Internal Controller, Data Protection Officer, Legal Affairs Sector, etc.
- Authorised staff from the European Traineeships Office;
- In addition, in case of control or dispute, personal data can 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. Commission Internal Audit Service, European 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.

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.

Technical and organisational security measures implemented by the European Traineeship Office for GestMax are described in their dedicated record.

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>.

For information regarding the processing of personal data by the European Traineeship Office, trainees shall refer to the [Traineeship Office's Privacy statement](#).

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

Your 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.

