Ref. Ares(2026)4173120 - 22/04/2026

EUROPEAN HEALTH AND DIGITAL EXECUTIVE AGENCY (HADEA)

RECORD OF PERSONAL DATA PROCESSING ACTIVITY

*In accordance with **Article 31 of the Regulation (EU) 2018/1725**[1] on the protection of natural persons with regards to the processing of personal data by the Union Institutions, bodies, offices and agencies and on the free movement of such data.*

Record No: HR.08 **Initial approval by Data Controller**: ARES registration date

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

NAME OF THE PROCESSING

Ability to work in a third EU Language

IDENTIFICATION OF THE DATA

Head of HaDEA Unit C.3 "Staff, Communication and Support"

GROUND FOR THIS RECORD (*select relevant ground*)

□ 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] 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).

1. INFORMATION ON THE PROCESSING ACTIVITY
ABILITY TO WORK IN A THIRD EU LANGUAGE

This processing activity is performed in accordance with **Regulation (EU) No 2018/1725**[2] 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. Data Controller:

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, who 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):

N/A

1.5 Description and purpose(s) of this processing:

The objective is to assess the jobholder's ability to work in a third language before their first promotion after recruitment in accordance with Article 45(2) of the Staff Regulations[3]. This requirement applies to temporary agents by analogy. Article 85(3) of the Conditions of Employment of Other Servants (CEOS), stipulates that Contract Agents of function group IV shall before renewal of their contract for an indefinite period be required to demonstrate their ability to work in a third language.

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[4] ;

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[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 L 295/39 of 21.11.2018).

[3] 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.

[4] 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, Articles 18(1) and 11(6)
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
Staff Regulations of Officials (Staff Regulations) and Conditions of Employment of Other Servants of the European Union (CEOS), and in particular Articles 12-15 and 82-84 of the CEOS.

☐ **(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)
☐ Visitors to the Agency
☐ Applicants
☐ Relatives of the data subject
☐ Complainants, correspondents and enquirers
☐ Witnesses
☐ Beneficiaries
☐ External experts
☐ Contractors
☐ Other, please specify: Members of the Selection Committee.

1.8 Categories of personal data

a) Categories of personal data:

The following categories of data are processed:

i) Personal Identification data: last name, first name, nationality, personal ID; personal email address, personal phone number;

ii) Career related data: grade, administrative status, Institution and place of employment, type of contract, unit, date of start and end of contract, office address, professional email address (derived from the last name and first name), phone number, status of participation (EU Learn) in EC language courses;

iii) Educational data: First and second languages chosen for the selection procedure leading to recruitment; Third language chosen by the jobholder; Title of diploma or certificates and training body where diploma was obtained and list of language exams passed during university studies. In the absence of proof, a test result from EPSO or a certificate of success of a Commission language course are mandatory for the purpose(s) outline above;

iv) Data being used to evaluate personal aspects of the data subject to assess their level in the third language.

b) Categories of personal data processing likely to present specific risks: N/A

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

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)

The Decision of the Steering Committee of HaDEA 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.

Commission Decision C(2017)6760 on the general provisions for implementing Article 79(2) of the Conditions of Employment of Other Servants of the European Union, governing the conditions of employment of contract staff employed by the Commission under the terms of Articles 3a and 3b thereof, which is applicable to HaDEA by virtue of Decision SC01(2021)06 on the application by analogy of the Implementing Rules of the Staff Regulations adopted by the Commission.

Personal data will be kept for a maximum period of 10 years after the extinction of all rights of the staff member at the end of the career. Data will be deleted at the end of this period.

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 recipients of personal data will be:

A. WITHIN THE AGENCY:

- HaDEA Appointing Authority (the Director of the Agency);
- HaDEA Head of Department C ('Finance and Resources') and (Deputy) Head of Unit C.3; HaDEA authorised staff from Sector C.3.1 ('People Sector') on a need-to-know basis; Joint Reclassification Committee members.

B. OUTSIDE THE AGENCY

- Authorised staff of the European Commission services in Directorate-General for Human Resources and Security (DG HR) dealing with the third language assessment;
- EPSO in case of test or diploma validation;
- External companies carrying out the tests in case of externalisation of the service.

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:

- Investigations and Disciplinary Office (IDOC);
- Bodies in charge of a monitoring or an inspection task in application of Union law (e.g. internal audit, Internal Audit Service (IAS), European Court of Auditors (ECA), etc.);
- The European Court of Justice (Court of Justice, the General Court and the Civil Service Tribunal) or a national judge as well as the lawyers and the agents of the parties in case of a legal procedure;
- The European Anti-Fraud Office (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 (EDPS) 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 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 the European Commission Directorate-General 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 responsible person in the unit in charge of this action (processing operation of the current record) collects and places personal data in electronic format on the secured drive of the Unit with restricted access on a need-to-know basis. All Agency staff and its contractors are bound by confidentiality obligations. 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 22/04/2026 13:01 (UTC+02) in accordance with Article 11 of Commission Decision (EU) 2021/2121