



Data Protection Notice for selection and management of Blue Book trainees

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 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(s) of this processing activity?

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 Agreement³ 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;
- 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.

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 European Traineeships Office acts as joint controller. You may find its Traineeship Privacy Statement [here](#).

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

Which personal data is collected?

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.

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.

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:

A. WITHIN THE AGENCY:

- a. Authorised staff in the People 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?

- a. In case of audits or proceedings, etc., HaDEA's Internal Controller, Data Protection Officer, Legal Affairs Sector, etc.
- b. Authorised staff from the European Traineeships Office;
- c. 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.

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?

We process your personal data on the basis of Article 5(1)(a) of Regulation 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 body and also in line with Article 5(1)(c) because 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.

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 2018/1725.

The legal bases for the processing activities are the following:

- 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 European Commission, and HaDEA⁴.

How long do we keep your personal data?

The personal data concerned **will be kept for a maximum period** of 5 years⁵ 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.

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

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 personal 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

⁴ Ares(2021)3121677), amended by Ares(2023)2909801.

⁵ The retention period should be decided in accordance with the Commission's [common retention list](#).

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 address them to the Head of Unit C.3 (entity acting as data controller) via e-mail to HADEA-PEOPLE@ec.europa.eu or to HaDEA Data Protection Officer at HADEA-DPO@ec.europa.eu.

You shall have right of recourse to the European Data Protection Supervisor at <https://edps.europa.eu>.

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