



RECORD OF PERSONAL DATA PROCESSING

Art. 31 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 (henceforth the "Regulation")

Record n°

015-2019

In accordance with Article 31 of Regulation 2018/1725, individuals whose personal data are processed by the Agency in any context whatsoever are to be protected with regard to the processing of personal data and the Agency has to keep records of their processing operations.

This record covers two aspects:

- 1. Mandatory records under Art 31 of the Regulation (recommendation: make the header and part 1 publicly available)*
- 2. Compliance check and risk screening (initial; part 2 is internal only to the Agency, not published)*

The ground for the record is (tick the relevant one):

- Regularization of a data processing operation already carried out*
- Record of a new data processing operation prior to its implementation*
- Change of a data processing operation.*

Internal mobility	
1	Last update of this record (where applicable) The first version of this record was from December 2019 (reference 15-2019).
2	Short description of the processing One of the main tasks of Unit RI is to manage the Human Resources policy of the Agency.

	This includes, among others, the implementation of an internal mobility procedure applicable to temporary and contract agents.
Part 1 - Article 31 Record	
4	<p>Name of the Controller Unit(s) and/or function of person acting on behalf of the Controller</p> <p>Controller: European Education and Culture Executive Agency Unit: Unit R1 (People, Workplace and Communication) EACEA-INTERNAL-MOBILITY@ec.europa.eu.</p>
5	<p>Name and contact details of the Data Protection Officer (DPO)</p> <p>EACEA-data-protection@ec.europa.eu</p>
6	<p>Name and contact details of joint controller (where applicable)</p> <p>N/A</p>
7	<p>Name and contact details of processor (where applicable)</p> <p>N/A</p>
8	<p>Purpose of the processing</p> <p>The processing operation is necessary for the internal mobility procedure in order to:</p> <ul style="list-style-type: none"> - have the best qualified internal candidates for vacant posts, and - manage administratively the applications and the different steps of the process.
9	<p>Description of the categories of data subjects</p> <p>Whose personal data are being processed? In case data categories differ between different categories of persons, please explain as well (e.g. suspects vs. witnesses in administrative inquiries)</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Agency staff (Contractual and temporary staff in active position) <input type="checkbox"/> Visitors to the Agency <input type="checkbox"/> Contractors providing goods or services <input type="checkbox"/> Applicants <input type="checkbox"/> Relatives of the data subject <input type="checkbox"/> Complainants, correspondents and enquirers <input type="checkbox"/> Witnesses <input type="checkbox"/> Beneficiaries <input type="checkbox"/> External experts

	<input type="checkbox"/> Contractors <input type="checkbox"/> Other, please specify:
10	<p>Description of personal data categories</p> <p>Indicate all the categories of personal data processed and specify which personal data are being processed for each category (between brackets under/next to each category):</p> <p><i>a) Categories of personal data:</i></p> <p><input checked="" type="checkbox"/> in the form of personal identification numbers</p> <p><input type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints</p> <p><input type="checkbox"/> concerning the data subject's private sphere</p> <p><input type="checkbox"/> concerning pay, allowances and bank accounts</p> <p><input checked="" type="checkbox"/> concerning recruitment and contracts</p> <p><input type="checkbox"/> concerning the data subject's family</p> <p><input checked="" type="checkbox"/> concerning the data subject's career, <u>grade, job title and last appraisal report if requested by the recruiting Head of Unit.</u></p> <p><input type="checkbox"/> concerning leave and absences</p> <p><input type="checkbox"/> concerning missions and journeys</p> <p><input type="checkbox"/> concerning social security and pensions</p> <p><input type="checkbox"/> concerning expenses and medical benefits</p> <p><input checked="" type="checkbox"/> concerning telephone numbers and communications</p> <p><input checked="" type="checkbox"/> concerning names and addresses (including email addresses)</p> <p><input checked="" type="checkbox"/> Other: please specify:</p> <ul style="list-style-type: none"> • <u>Unit of assignment,</u> • <u>Languages,</u> • <u>Diploma and training,</u> • <u>Professional experience,</u> • <u>Any other relevant detail the candidate wishes to add to the application.</u> <p><i>b) Categories of personal data processing likely to present specific risks:</i></p> <p><input type="checkbox"/> data relating to suspected offences, offences, criminal convictions or security measures</p> <p><input checked="" type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct) <u>CV and motivation letter</u></p> <p><i>c) Categories of personal data whose processing is prohibited, with exceptions (art. 10):</i></p> <p><input type="checkbox"/> revealing racial or ethnic origin</p> <p><input type="checkbox"/> revealing political opinions</p> <p><input type="checkbox"/> revealing religious or philosophical beliefs</p> <p><input type="checkbox"/> revealing trade-union membership</p>

	<input type="checkbox"/> concerning health <input type="checkbox"/> genetic data, biometric data for the purpose of uniquely identifying a natural person <input type="checkbox"/> concerning sex life or sexual orientation d) Specify any additional data or explanatory information on the data being processed, if any: _____
11	<p>Retention time (time limit for keeping the personal data)</p> <p>The applications of candidates together with all other documents containing personal data collected during the mobility process are kept in the mobility file (electronic version) for 2 years after the mobility is closed (Section 12.3.4 D bis of the Common Retention List (CRL) – Commission Decision SEC/2019/900 of 25/4/2019).</p> <p>The mobility working files (exchange of mails between EACEA HR, the staff member and the recruiting unit) are saved in a restricted HR dedicated electronic platform and/or in the Functional Mailboxes and are kept for maximum 4 years (Section 12.3.14 of the CRL). The same retention time applies for documents filed in a specific restrict ARES folder (mobility acts).</p> <p>The workflow of the mobility decision is managed in Ares: the decision is stored in the staff member’s personal file (paper and Ares version). The retention period of the personal file is 8 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 (Section 12.3.7 of the CRL).</p> <p>Is any further processing for historical, statistical or scientific purposes envisaged? <input checked="" type="checkbox"/> yes <input type="checkbox"/> no</p> <p>Before eliminating the mobility files, HR may prepare a list with anonymised data (category and number of candidates)</p>
12	<p>Recipients of the data</p> <p>EACEA Human Resources sector (Selection team, Head of Sector, Head of Unit) EACEA Director EACEA Heads of Department The recruiting EACEA Head of Unit Interview Panel, which might include staff members of the selecting EACEA Units, of another Unit or of another Institution (e.g. another Agency, the Commission) Secretary of Heads of Unit/ Heads of Department (supporting in the organisation of the interviews) from EACEA</p>
13	<p>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</p> <p>N/A</p>
14	<p>General description of the technical and organisational security measures</p>

	<p>1. <u>Organisational measures:</u></p> <p>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.</p> <p>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 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.</p> <p>The HR sector is responsible for the electronic mobility file. The Heads of the recruiting Unit are responsible for the copies of the applications they receive from the HR for the assessment of suitable candidates for the post within the context of the mobility exercise.</p> <p>Access to the electronic mobility file is only granted to HR staff, bound by the confidentiality principle. All relevant mobility electronic files (CVs and motivation letters) are stored on the restricted area of SharePoint that is accessible only to designated HR staff. Such confidential documents shall be saved with a restricted access, and will be accessible only to those handling the mobility. The internal mobility request and the mobility decision are managed in Ares with restricted access granted only to those concerned.</p> <p>2. <u>Technical measures</u></p> <p>State of the art technical cybersecurity measures are implemented in the corporate systems, according to the security needs. Those measures are in constant evolution.</p>
15	<p>Information to data subjects / Privacy Statement</p> <p>Applicants to internal mobility can find information about the Privacy Policy of the Agency in the Privacy statement published on the intranet section dedicated to Internal mobility.</p>