



EUROPEAN EDUCATION AND CULTURE  
EXECUTIVE AGENCY (EACEA)

**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°

002-2020

*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.*

Blue Book trainees	
1	<b>Last update of this record (where applicable)</b>  The first version of this record was from April 2020 (reference 002-2020).
2	<b>Short description of the processing</b>  Each year EACEA offers five-month paid traineeships to selected trainees in Gestmax. The European Traineeship Office (Directorate General Education Youth, Sport and Culture, Website: <a href="http://ec.europa.eu/stages/">http://ec.europa.eu/stages/</a> ) is responsible for the selection of candidates to be included in Gestmax. Personal data of candidates are collected and stored under the responsibility of the Traineeship Office (DPR-EC-01746).  The EACEA has signed with the European Commission a Service Level Agreement (Ares(2016) 7018400) which governs the Agency's access to the traineeship scheme. Data processing by EACEA concerns only the selection of trainees from Gestmax and the daily management of recruited trainees during their traineeship at the Agency.

<b>Part 1 - Article 31 Record</b>	
3	<p><b>Name of the Controller</b>  <b>Unit(s) and/or function of person acting on behalf of the Controller</b></p> <p>Controller: European Education and Culture Executive Agency  Unit(s): Unit R1 People, Workplace and Communication  <a href="mailto:EACEA-HR@ec.europa.eu">EACEA-HR@ec.europa.eu</a></p>
4	<p><b>Name and contact details of the Data Protection Officer (DPO)</b></p> <p><a href="mailto:EACEA-data-protection@ec.europa.eu">EACEA-data-protection@ec.europa.eu</a></p>
5	<p><b>Name and contact details of joint controller (where applicable)</b></p> <p>For selection and overall management of the Traineeships scheme including recruiting trainees via Gestmax: European Commission, Directorate General Education, Youth, Sport and Culture  Directorate B3 – Youth, Volunteer Solidarity and Traineeships Office, J-70  <a href="mailto:Eac-Stages@ec.europa.eu">Eac-Stages@ec.europa.eu</a></p> <p>Service Level Agreement between EACEA and DG EAC (Ares(2016) 7018400)</p>
6	<p><b>Name and contact details of processor (where applicable)</b></p> <p>N/A</p>
7	<p><b>Purpose of the processing</b></p> <p>Personal data is processed to organise the selection procedures in view of the recruitment of trainees at EACEA and to conduct the traineeship in an appropriate manner.</p>
8	<p><b>Description of the categories of data subjects</b></p> <p><input type="checkbox"/> Agency staff (Contractual and temporary staff in active position)</p> <p><input type="checkbox"/> Visitors to the Agency</p> <p><input type="checkbox"/> Contractors providing goods or services</p> <p><input checked="" type="checkbox"/> Applicants, <b>Blue Book trainees</b></p> <p><input type="checkbox"/> Relatives of the data subject</p> <p><input type="checkbox"/> Complainants, correspondents and enquirers</p> <p><input type="checkbox"/> Witnesses</p> <p><input type="checkbox"/> Beneficiaries</p> <p><input type="checkbox"/> External experts</p> <p><input type="checkbox"/> Contractors</p> <p><input type="checkbox"/> Other, please specify:</p>

9	<b>Description of personal data categories</b>
	<p><i>a) Categories of personal data:</i></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> in the form of personal identification numbers: <b><u>number of a candidate</u></b></li> <li><input checked="" type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints <b><u>photo for the Agency intranet on My IntraComm (based on their consent)</u></b></li> <li><input checked="" type="checkbox"/> concerning the data subject's private sphere <b><u>date of birth, place of birth, country of birth, gender, nationality, marital (civil) status</u></b></li> <li><input type="checkbox"/> concerning pay, allowances and bank accounts</li> <li><input checked="" type="checkbox"/> concerning recruitment and contracts <b><u>traineeship period</u></b></li> <li><input type="checkbox"/> concerning the data subject's family</li> <li><input checked="" type="checkbox"/> concerning the data subject's career: <b><u>CV, education, training experiences, previous professional experiences, language knowledge, hard and soft skills, preference on the traineeship, motivation</u></b></li> <li><input checked="" type="checkbox"/> concerning leave and absences <b><u>days off</u></b></li> <li><input type="checkbox"/> concerning missions and journeys</li> <li><input type="checkbox"/> concerning social security and pensions</li> <li><input type="checkbox"/> concerning expenses and medical benefits</li> <li><input checked="" type="checkbox"/> concerning telephone numbers and communications <b><u>personal phone number</u></b></li> <li><input checked="" type="checkbox"/> concerning names and addresses (including email addresses) <b><u>surname, first name, middle name(s), maiden name, permanent address, emergency contact address, email address</u></b></li> <li><input type="checkbox"/> Other: please specify participation in mandatory trainings</li> </ul> <p><i>b) Categories of personal data processing likely to present <u>specific risks</u>:</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> data relating to suspected offences, offences, criminal convictions or security measures</li> <li><input checked="" type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct) <b><u>final evaluation report following the traineeship period</u></b></li> </ul> <p><i>c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> revealing racial or ethnic origin</li> <li><input type="checkbox"/> revealing political opinions</li> <li><input type="checkbox"/> revealing religious or philosophical beliefs</li> <li><input type="checkbox"/> revealing trade-union membership</li> <li><input checked="" type="checkbox"/> concerning health <b><u>medical certificate</u></b>; it is important to note that this certificate <b><u>does not contain</u></b> medical data in the strict sense but the period of recommended medical leave</li> <li><input type="checkbox"/> genetic data, biometric data for the purpose of uniquely identifying a natural person</li> <li><input type="checkbox"/> concerning sex life or sexual orientation</li> </ul> <p><i>d) Specify any additional data or explanatory information on the data being processed, if</i></p>

	<i>any:</i> _____
10	<p><b>Retention time (time limit for keeping the personal data)</b></p> <p>All personal data of Blue Book trainees are collected and processed by the Traineeships Office of the European Commission (traineeship scheme). A specific privacy statement regarding the retention period of different categories of personal data can be found <a href="#">here</a>.</p> <p>Personal data of trainees are also kept in Sysper (Corporate tool). A specific privacy statement regarding the retention period of different categories of personal data in Sysper can be found <a href="#">here</a>.</p> <p>Spontaneous applications are not kept by EACEA and are immediately deleted.</p> <p>The Agency stores limited personal data of trainees for the duration of their traineeship (CVs, list with names, the photo for My IntraComm (including the consent) and contact details); all data are eliminated immediately at the end of traineeship period.</p> <p><b>Is any further processing for historical, statistical or scientific purposes envisaged?</b>  <input type="checkbox"/> yes <input checked="" type="checkbox"/> no</p>
11	<p><b>Recipients of the data</b></p> <ul style="list-style-type: none"> <li>• European Commission DGs, in particular, DG EAC who is centralising the blue book traineeship scheme</li> <li>• The Human Resources Unit of EACEA</li> <li>• The Director of EACEA</li> <li>• The Head(s) of Department</li> <li>• Heads of Units of EACEA</li> <li>• The Traineeship Coordinator of EACEA</li> <li>• Designated Recruiters of Units of EACEA</li> <li>• Designated Traineeship Advisors of Units of EACEA</li> <li>• Secretaries of EACEA</li> </ul> <p>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:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• The European Anti-Fraud Office (OLAF);</li> <li>• The Internal Audit Service of the Commission</li> <li>• The Investigation and Disciplinary Office of the Commission (IDOC)</li> <li>• The European Court of Auditors</li> <li>• The European Ombudsman</li> <li>• The European Public Prosecutor's Office</li> <li>• EU courts and national authorities</li> </ul>
12	<p><b>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</b></p> <p>N/A</p>

13	<p><b>General description of the technical and organisational security measures</b></p>
	<p>The European Commission's IT systems used by the Agency abide by the Commission's security guidelines. The Agency must comply with Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.</p> <p><b>1. <u>Organisational measures:</u></b></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.</p> <p>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.</p> <p><b>2. <u>Technical measures:</u></b></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> <p>Technical and organisational security measures implemented by DG EAC for Gestmax are described in the dedicated record (DPR-EC-01746.2): <a href="#">DPO Public register (europa.eu)</a></p>
14	<p><b>Information to data subjects / Privacy Statement</b></p> <p>Candidates can find information on personal data protection in relation to EACEA recruitment procedure, on <a href="#">EACEA's webpage</a> (section dedicated to the recruitment) and the intranet.</p> <p>For information regarding the processing of personal data by the Traineeship Office, trainees refer to the <a href="#">Traineeship Office's Privacy statement</a>.</p> <p>For information regarding the publication of photos on the Intranet, please see the privacy statement on the <a href="#">Intranet (europa.eu)</a>.</p>