



Education, Audiovisual and Culture Executive Agency

**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°

09-2019

*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.*

Selection and management of interim staff	
<b>1</b>	<p><b>Last update of this record (where applicable)</b></p> <p>Last update of the former notification forms was on 9/08/2010:</p> <ul style="list-style-type: none"> <li>• Notification n° 2010-004 Interim</li> </ul>
<b>2</b>	<p><b>Short description of the processing</b></p>

	<p>The main steps of the processing can be summarized as follows:  At the beginning of each month every Unit is asked to estimate their demand for interim staff for the coming month. For each interim position the HR search for a candidate via the temping agency and the spontaneous applications received.</p>
<b>Part 1 - Article 31 Record</b>	
3	<p><b>Name of the Controller  Unit(s) and/or function of person acting on behalf of the Controller</b></p> <p>Controller: Education, Audiovisual and Culture Executive Agency  Head of Unit R1 (Human Resources, Administration, Communication  Email: <a href="mailto:EACEA-HR@ec.europa.eu">EACEA-HR@ec.europa.eu</a></p>
4	<p><b>Contact details of the Data Protection Officer (DPO)</b></p> <p>EACEA-data-protection@ec.europa.eu</p>
5	<p><b>Name and contact details of joint controller  (where applicable)</b></p> <p>N/A</p>
6	<p><b>Name and contact details of processor</b></p> <p><b>Randstad</b>  Email: <a href="mailto:inhouse_1230@randstad.be">inhouse_1230@randstad.be</a></p>
7	<p><b>Purpose of the processing</b></p> <p>The processing is necessary for the selection of interim staff, in order to offer short term contracts to the best qualified, most suitable candidates. The purpose is to select interim staff at EACEA and manage the different stages of the selection. The EACEA employs staff on a temporary basis on short term contracts exclusively through temping agencies.</p>
8	<p><b>Description of the categories of data subjects</b></p> <p>Whose personal data are being processed?</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</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>

	<input type="checkbox"/> Beneficiaries <input type="checkbox"/> External experts <input type="checkbox"/> Contractors <input type="checkbox"/> Other, please specify:
9	<b>Description of personal data categories</b>
	<p><b><i>a) Categories of personal data:</i></b></p> <p><input checked="" type="checkbox"/> in the form of personal identification numbers (<b><u>selected interim are required to provide copy of their passport or identity card</u></b>)</p> <p><input checked="" type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints (<b><u>if the candidate has included a photo in their CVs</u></b>)</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 (<b><u>employment record, time sheet</u></b>)</p> <p><input type="checkbox"/> concerning the data subject's family</p> <p><input checked="" type="checkbox"/> concerning the data subject's career: (<b><u>CVs</u></b>)</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 (<b><u>telephone number</u></b>)</p> <p><input checked="" type="checkbox"/> concerning names and addresses (including email addresses) (<b><u>email address</u></b>)</p> <p><input type="checkbox"/> Other: please specify: _____</p> <p><b><i>b) Categories of personal data processing likely to present <u>specific risks</u>:</i></b></p> <p><input type="checkbox"/> data relating to suspected offences, offences, criminal convictions or security measures</p> <p><input type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct)</p> <p><b><i>c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):</i></b></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> <p><input type="checkbox"/> concerning health</p> <p><input type="checkbox"/> genetic data, biometric data for the purpose of uniquely identifying a natural person</p> <p><input type="checkbox"/> concerning sex life or sexual orientation</p>

	<b>d) Specify any additional data or explanatory information on the data being processed, if any: -</b> _____
10	<p><b>Retention time (time limit for keeping the personal data)</b></p> <p>The CVs of candidates are stored by EACEA for 6 months from reception. The retention period of the purchase order, employment record, HR overview, HR lists and original weekly timesheets are kept for 5 years after the budget discharge (article 75 Financial Regulation<sup>1</sup>). After this period the files are eliminated.</p> <p>Data allowing for the identification and regarding the career of interim staff is stored the EC Corporate Tool Sysper. Retention period in the Sysper EC Corporate tool is determined by the Commission and is outside of the Agency's control. The specific Privacy Statement regarding the retention periods for the time management module retrieved from <a href="#">here</a>.</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>• Director of EACEA</li> <li>• Head of Department of EACEA</li> <li>• Heads of Operational Units of EACEA</li> <li>• Deputy Heads of Unit of EACEA</li> <li>• Heads of Sector of EACEA</li> <li>• Staff of the Human Resources Sector of EACEA</li> <li>• Financial Sector EACEA</li> <li>• Temping Agency (Randstad)</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><b>NO</b></p>
13	<p><b>General description of the technical and organisational security measures</b></p> <p><b>a) Organisational measures:</b>  Organisational measures include appropriate access rights and access control. Only designated HR Staff has access to the mailbox where the temping agency forwards the list of suitable candidates. The electronic version of CVs are stored on SharePoint (HR restricted) and only the HR involved in the selection have access. Only designated staff has access to the Ares document and the paper dossier. Internal employment history of interim staff is kept in Sysper with restricted access. In any case of internal transmission recipients are reminded that they can use the information only for the purpose of the selection procedure and they are bound by the Agency's confidentiality policy.</p>

<sup>1</sup> Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012, OJ L 193, 30.7.2018, p. 1.

	<p><b>b) <u>Technical measures:</u></b></p> <p>Technical measures include the use of secure equipment (e.g. locked rooms) and IT-tools (including secure connections, firewalls, etc.) The Agency's IT systems abide by the Commission's security guidelines. The Agency must comply with Commission Decision <u>(EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission</u>. In this context a specific 'Information Security Technology Plan' is reviewed annually with a view to describe the implementation of the above rules and guidelines in EACEA. The procedures set out in the document must be applied to the Agency's IT systems to ensure the security of the stored data and they are based on the European Commission's standards on security. The Server Rooms of the Agency are equally protected and locked.</p> <p>Paper copies: during the financial year the paper versions are stored in locked cupboards and then in the archives of a locked room (after the financial year had ended). The Server Rooms of the Agency are equally protected and locked.</p>
14	<p><b>Information to data subjects / Privacy Statement</b></p> <p>The process starts with the screening of personal data sent by the temping agency.</p> <p>Candidates find information on personal data protection in relation to EACEA interim recruitment procedure, on EACEA's webpage, in the section dedicated to the recruitment policy. (<a href="#">Link</a>) In addition, the information about the Privacy policy of the Agency is given to successful candidates by email, when they start working (welcome email, containing some practical information, refers to the Agency's Privacy statement on its website).</p>