



EUROPEAN RESEARCH EXECUTIVE AGENCY

RECORD OF PERSONAL DATA PROCESSING ACTIVITY

In accordance with Article 31 of the Regulation (EU) 2018/1725 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 data¹ ('the Regulation'), individuals whose personal data are processed by the European Research Executive Agency ('REA' or '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 activities.

Record No: NA
 Created on (date):
 Last update (date): **31.3.23**

NAME OF THE PROCESSING ACTIVITY

Selection and recruitment of statutory (Temporary Agents and Contract Agents) and non-statutory staff (Blue Book Trainees and Interim Agents)

GROUND FOR THE RECORD (TICK THE RELEVANT ONE):

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

IDENTIFICATION OF THE DATA CONTROLLER

European Research Executive Agency (REA)

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 November 2018).

1. MANDATORY RECORD UNDER ARTICLE 31 OF THE REGULATION

(PART I - PUBLISHABLE VERSION FOR EXTERNAL PUBLICATION)

1.1. Contact details of controller

The controller is the European Research Executive Agency (“REA or Agency”), represented by its Director. For organisational reasons, the role of the data controller has been entrusted by the Director to the delegated controller and is exercised by the Head of Unit REA.D.2 “People and Workplace. (“REA D.2” or “REA HR”)

The data controller may be contacted via the following functional mailboxes (depending on the nature of the processing activity):

- for statutory staff - Temporary Agents and Contract Agents: REA-HR-SELECTION-RECRUITMENT@ec.europa.eu
- for Interim Agents - REA-INTERIM-AGENTS@ec.europa.eu;
- for Blue Book Trainees- REA-TRAINEES@ec.europa.eu.

1.2. Contact details of the Data Protection Officer (DPO)

REA DPO: REA-DATA-PROTECTION-OFFICER@ec.europa.eu

1.3. Name and contact details of joint controller (where applicable)

For trainees

Traineeships Office, J-70 3/020, EAC Bureau des Stages: eac-stages@ec.europa.eu. The Joint Controllership Agreement (“JCA”) is Annex 1 to the Service Level Agreement (“SLA”) and is an integral part of the SLA². DG EAC Traineeships Office (“Traineeships Office”) acts as sole controller in relation to the management of applications via the Gestmax platform³ as well as the pre-selection of Blue Book Trainees (“Trainees”) based on the selection criteria established by the Traineeships Office.⁴

For other selection and recruitment activities

For joint selections organised by two or more Executive Agencies⁵ (“Agencies”), those Agencies will act as joint controllers. A JCA will be signed among the Agencies and information on the processing will be provided to candidates.

Where reserve lists are shared among Agencies pursuant to the Memorandum of Understanding for the sharing of reserve lists⁶ (“the Memorandum”), the Agencies are not joint controllers. The Agency of origin of the reserve lists remains the controller and the other Agencies are recipients of the personal data.

² Ares(2022)8616442 -12 December 2022: amendment to Service Level Agreement (SLA) which was signed on 23 December 2016 between DG EAC (Directorate “Youth and Sport”) and REA concerning the recruitment of Blue Book Trainees.

³ This platform replaces the Blue Book database (VBB).

⁴ SLA REA- DG EAC, Article 3.2.

⁵ European Climate, Infrastructure and Environment Executive Agency (CINEA), the European Health and Digital Executive Agency (HADEA), the European Research Executive Agency (REA), the European Innovation Council and SMEs Executive Agency (EISMEA), the European Research Council Executive Agency (ERCEA), and the European Education and Culture Executive Agency (EACEA)

⁶ [Memorandum of Understanding concerning the modalities and procedures of interaction between the Executive Agencies on the sharing of reserve lists \(Ares\(2022\)8128318\)](#)

1.4. Name and contact details of processor (where applicable)

DG DIGIT SLA signed on 06.08.2019 (DIGIT-MOU@ec.europa.eu);

DG HR - Service Level Agreement signed on 24 January 2018, HR-BXL-HEALTH-CONTRACTS@ec.europa.eu;

DG HR for SYSPER (HR-MAILA3@ec.europa.eu);

PMO - Service Level Agreement signed on 3 October 2018 PMO-DATA-PROTECTION@ec.europa.eu.

For the organisation of online written tests: Testreach⁷ - Block 9-10 Nexus UCD, Belfield Office Park, Beech Hill Road, Dublin 4, D04 V2N9, Ireland (info@testreach.com). Data Protection Agreement signed on 18 March 2022.

For the e-recruitment tool: Talentsoft⁸ – Cegid, 8 Rue Heyrault, 92100 Boulogne-Billancourt, France, info@cegid.com. Enterprise Licence Agreement (ELA) within DI/07722 Framework Contract signed with Insight on 6 September 2018.

For the recruitment of Interim Agents⁹:

- Randstad Belgium s.a., Randstad European Union, 8-10 Rue des Princes, 1000 Bruxelles, E-mail: inhouse.1230@randstad.be
- Start People NV, Frankrijklei 101, 2000 Antwerpen, E-mail: contact@startpeople.be, 03/800.66.92
- Daoust s.a., Galerie de la porte Louise 203/5 1050 Bruxelles, Email: publicsector@daoust.be
- Any other external contractor Interim or tool that REA may hire/use under a framework contract for this processing.

1.5. Purpose of the processing

REA HR defines, coordinates and ensures the implementation of human resources policies for selection and recruitment activities of Contract Agents and Temporary Agents, Blue Book Trainees and Interim Agents on the basis of the relevant provisions of the Staff Regulations, the Conditions of Employment of Other Servants of the European Communities (CEOS) and General Implementing Provisions (GIPs) as applicable.

In order to fill in the vacancies of Contract Agents and Temporary Agents according to the establishment plan, REA HR organises the whole selection process (except in cases of joint selections where this responsibility is shared among the participating Agencies or with the lead Agency).

The selection process starts when a REA unit notifies REA HR that a post is vacant (or will be vacant) for a Temporary Agent or Contract Agent and ends once the job offer has been accepted by the selected candidate(s) and once the recruitment procedure has been completed.

The data processing aims at ensuring compliance with all legal requirements and with the proper management of staff working at the Agency.

⁷ REA could hire other contractors to organise the on-line written tests.

⁸ REA could hire other contractors and use other e-recruitment tools.

⁹ REA could hire Interim agents via other Interim agencies.

The purpose of the processing is to receive applications, evaluate, select and recruit the best candidates for the positions available in REA, in compliance with the requirements of the Staff Regulation and CEOS, the General Implementing Provisions and the call for expression of interest/vacancy notice for each post. In particular, it is necessary in order to:

- Manage the correspondence with candidates;
- Verify if candidates fulfil the eligibility criteria;
- Conduct all necessary screening of applications (as decided by the Selection Committee and in accordance with the call);
- Organise and conduct interviews and written tests and/or computer-based tests organised by REA;
- Establish a list of selected candidates to be recruited as Temporary Agents or Contract Agents by REA;
- Share reserve lists with other Agencies.

Depending on the nature of the selection, the processing may also involve online testing and the use of an e-recruitment portal (described below in further detail).

The recruitment process starts at the moment the candidate accepts the job offer and ends with the entry into service. The processing operation is necessary for the recruitment of Contract and Temporary Agents in order to fill in vacant posts for which the respective selection procedure has been completed. In particular, it is necessary in order to:

- Manage the personal file of recruited staff;
- Establish and manage the individual rights of recruited staff;
- Manage the documentation relevant to the career of the recruited staff.

Sharing of reserve lists of Contract Agents and Temporary Agents

In order to fill in the vacancies for Contract Agents and Temporary Agents according to the establishment plan, REA participates in the sharing of reserve lists among Agencies via the Memorandum (see footnote 4).

According to the Memorandum, the Agencies upload reserve lists onto a central repository, from which candidates may be identified and recruited.

Therefore, the processing operation is necessary for ensuring the population of the repository and to facilitate the identification and recruitment of the best-qualified candidates according to the requirements of the vacant post at any given time.

For pre-existing reserve lists, the explicit consent of the selected candidates will be obtained to be included in the repository, documented and retained prior to any sharing of data. For future selections, candidates will be informed of the processing operation in the call documentation. Candidates will have the opportunity to inform REA if they wish to opt out of their data being shared among Agencies.

The Agency of origin of the reserve list remains the data controller of that reserve list and associated data, until such a time as it is shared on the central repository.

The recruitment processes are fully managed by each Agency and subject to their specific data protection records and notices for the recruitment of Temporary or Contract Agents.

Blue Book Trainees

REA offers a five-month in-service training for a limited number of university graduates that are part of the European Commission's Blue Book Traineeship scheme. REA services that are allocated a Trainee select suitable candidates from the Gestmax platform. The selected REA candidates are drawn from the preselected list included in the Gestmax platform, managed by the Traineeships Office that permits the REA Traineeship Coordinator ("The Coordinator") to recruit and for advisers to evaluate the Trainees as well as to manage their file during the Traineeship with REA.

The REA units that would like to recruit a Trainee participate in the evaluation of the CVs of the Trainees.

Trainees are invited to apply via a Call for expression of interest that is managed by The Traineeships Office and that REA publishes on its internet site.

REA selects candidates via the Gestmax platform.

REA processing operations are for the following purposes:

- to select, recruit and evaluate Trainees from the preselected candidates included in the Gestmax platform and the Excel worksheet;
- to manage HR matters during the Traineeship at REA;
- to prepare the appropriate IT and technical environment for their responsibilities;
- to grant access rights to the REA building;
- to register Trainees in SYSPER;
- to manage the everyday tasks and day-to-day time management of the Trainees;
- to evaluate the Trainees at the end of their Traineeship.

Interim Agents

In order to ensure the continuity of operations, replacing staff on long-term absences, or support staff in a period of excessive workload, REA employs Interim Agents on short-term contracts through an Interim Agency (see current list of Interim Agencies under section 1.4).

The processing operation is necessary for the selection and administration of Interim Agents, in order to offer short-term contracts to the best-qualified and most suitable candidates. In addition, it is necessary for the verification of timesheets and invoices.

In particular, this processing is necessary to recruit Interim Agents, at short notice, in order to:

- Replace permanent staff in the case of maternity leave, long-term sickness, etc;
- Take on additional workforce for a fixed period of time.

Junior Professional Programme (JPP)

In the framework of the Junior Professional Programme (JPP), which is an internal selection programme created by the European Commission and extended to Executive Agencies staff and trainees, the Agency acts as processor of DG HR during the preselection phase. Selected Junior Professionals are offered a contract as temporary agents in the Commission in function group AD, grade 5, where applicable, for a period of 36 months. DG HR is the controller for the definition, organisation and coordination

of the programme and will be the authority authorised to conclude contracts (AECC), irrespectively of where the candidate comes from.

1.6. Legal basis for the processing

Article 5(1) (a), (b), (c) and (d) of the Regulation:

(a) 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 body¹⁰;

(b) processing is necessary for compliance with a legal obligation to which the controller is subject;

(c) 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;

Other legal basis

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 Union programmes¹¹:

1. Article 18 lays down the general conditions regarding the staff to be recruited by the Executive Agencies:
 - a. Article 18(1), the Executive Agency's staff shall consist of Community officials seconded as Temporary Agents by the institutions to positions of responsibility in the Executive Agency, and of other Temporary Agents directly recruited by the Executive Agency, as well as of other servants recruited by the Executive Agency on renewable contracts. The nature of the contract, governed by either private law or public law, its duration, and the extent of the servants' obligations vis-à-vis the agency, and the appropriate eligibility criteria shall be determined on the basis of the specific nature of the tasks to be performed, and shall comply with the Staff Regulations as well as with current national legislation.

¹⁰ 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; and COMMISSION DECISION C(2021)952 of 12 February 2021 delegating powers to the European Research Executive Agency with a view to the performance of tasks linked to the implementation of Union programmes in the field of Research and Innovation, Research of the Fund for Coal and Steel and Information Provision and Promotion Measures concerning Agricultural Products comprising, in particular, implementation of appropriations entered in the general budget of the Union.

¹¹ [OJ L 11, 16.1.2003, p. 1–8](#)

- b. Article 18(3), the Steering Committee, in agreement with the Commission, shall adopt the necessary implementing rules for personnel management within the Agency, if necessary.
 - c. Article 11(6), the Director shall be empowered under the Conditions of Employment of other servants of the European Union to conclude contracts of employment in respect of staff of the Agency (“AECC”). The Director shall be responsible for all other matters relating to personnel management within REA (“Director” or “AECC”).
2. European Commission Implementing Decision 2021/173, of 12 February 2021 establishing the European Research Executive Agency and repealing Decision 2013/778/EU¹².
3. Commission Decision C(2021) 952 delegating powers to the European Research Executive Agency with a view to the performance of tasks linked to the implementation of Union programmes in the field of Research and Innovation, Research of the Fund for Coal and Steel and Information Provision and Promotion Measures concerning Agricultural Products¹³.
4. Staff Regulations of officials and the Conditions of Employment of Other Servants of the European Union (CEOS)¹⁴:
 - Chapter 3 CEOS concerning the conditions of engagement of Temporary Agents (Articles 12-15 of the CEOS):
 - Articles 1-10 of Annex VII of the Staff Regulations, which are applicable to Temporary Agents in accordance with Articles 19 to 27 of the CEOS, concerning basic salaries, family allowances, expatriation allowance and payment in the event of death;
 - Chapter 6 CEOS (Articles 28 to 44) covering social security benefits: sickness and accident insurance, social security benefits, insurance against the risk of invalidity and death, retirement pension and severance grant;
 - Articles 82-84 concerning the conditions of engagement of Contract Agents;
 - Articles 1-10 of Annex VII of the Staff regulations, which are applicable to Contract Agents in accordance with Articles 92 and 94 of the CEOS, concerning basic salaries, family allowances, expatriation allowance and payment in the event of death and the installation and resettlement allowances;
 - Chapter 8 CEOS (Articles 95 to 115) covering social security benefits: sickness and accident insurance, social security benefits, insurance against the risk of invalidity and death, retirement pension and severance grant.
5. Decision of the REA Steering Committee (REA/SC(2015)WP.1) on the General Implementing Provisions on the procedure governing the engagement and the use of Temporary Agents under Article 2(f) of the Conditions of Employment of Other Servants of the European Union at REA (“GIPs”).

¹² [OJ L 50, 15.2.2021, p. 9–28](#)

¹³ [C\(2021\) 952](#)

¹⁴ [Staff Regulations \(europa.eu\)](#)

6. Decision of the REA Steering Committee Decision (REA/SC(2017)4.5) applying by analogy the Commission decision C(2017)6760 final on 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.¹⁵
7. Commission Decision C(2005)458 of 2 March 2005 governing the official Traineeships scheme of the European Commission.¹⁶
8. Service Level Agreement with DG HR signed on 24 January 2018.
9. Service Level Agreement with DG DIGIT signed on 6 August 2019.
10. Service Level Agreement with PMO signed on 3 October 2018.
11. Service Level Agreement with DG EAC signed on 23 December 2016 and amended on 12 December 2022.
12. Framework contract under which Interim Agents can be hired - Contract N° HR/R1/PR/2019/023.
13. Memorandum of Understanding for the sharing of reserve lists.
14. Enterprise License Agreement (ELA) within DI/07722 Framework Contract signed with Insight on 6 September 2018 for services provided by Talentsoft.
15. Data Protection Agreement signed with TestReach on 18 March 2022.

1.7. Categories of data subjects

- Candidates participating in selection procedures and to be recruited as Contract Agents (3)(a) and as Temporary Agents (2)(f);
- Members of a Selection Committee;
- Assessors or observers (if applicable in the selection procedure);
- Applicants for a Blue Book Traineeship, recruited Trainees and former Trainees;
- Trainee Supervisor and REA Traineeship Coordinator;
- Contact person in case of emergency included in SYSPER. It is the responsibility of the Trainee to ensure the accuracy of these data and for providing these data to REA;
- Persons that have received a job offer to carry out a Traineeship, signed a Traineeship convention (Trainees) or a contract with an Interim Agency to work as Interim Agent within the Agency;
- Interim Agent candidates, recruited Interim Agents and former Interim Agents pre-selected and proposed by the Interim Agencies;
- Contact persons at Interim Agency or from other external contractors (TestReach/Talentsoft);
- Test supervisors (only in rare circumstances where REA receives a recording of the test in case of challenge or appeal).

¹⁵ [Commission Decision C\(2017\) 6760 final.pdf \(europa.eu\)](#)

¹⁶ [Rules governing the official Traineeships scheme of the European Commission | Traineeships \(europa.eu\)](#)

1.8. Categories of personal data

The categories of data are:

1. During the **selection phase** for Contract Agents and Temporary Agents, the following documents and personal data may be processed, including the information provided by candidates on the e-recruitment tool¹⁷ or provided by candidates to REA:
 - a. Personal details allowing identification of the candidate: title, surname at birth, current surname, forename, address, postcode, city, date of birth, place of birth, nationality, sex, number and validity date of identification document, telephone number, email address. Candidates may provide their photograph on a voluntary basis.
 - b. Information provided by the candidate to allow the organisation of the selection procedure: contact address, postcode, city, country, telephone numbers, languages for correspondence and any applicable special needs;
2. Information contained in the CV. The level and type of data depends on the information that candidates provide:
 - a. Work experience: dates, start and end dates, position/title, work regime (full-time or part-time), occupation category, type of business or sector, occupation classification, name and address of employer, occupation or position held, main activities and responsibilities;
 - b. Education and training: dates, education diplomas or certificates, name and type of educational organisation, principal subjects/occupational skills, level of national qualification;
 - c. Languages: mother tongue, other languages and the level for each language specified (spoken, written, reading);
 - d. Skills and competencies: personal skills, social skills, technical skills, artistic skills, driving license, other skills, additional information;
 - e. References/contact details of referees.
3. Motivation letter and/or application form: the motivation to apply and a description of relevant strengths and achievements of the candidate.
4. Information concerning the assessment, interviews and eligibility check of the candidates:
 - a. Written test, including the name of the candidate and contact details (email and telephone number) that are provided to the online testing provider only for the purposes of organising the written test;
 - b. Pre-selection screening tables with the comments of the Selection Committee;
 - c. Minutes of the pre-selection and list of candidates to be interviewed signed by all members of the Selection Committee and the AECC;
 - d. Interview performance grids with collective final comments of the Selection Committee, including an assessment of the candidate's individual performance, which are signed by all members of the Selection Committee and the AECC;

¹⁷ REA currently uses Talentsoft.

- e. Candidates may be requested to provide supporting documents for their education, work experience, ID proving nationality, languages. These documents will be verified by REA HR.
 - f. Reserve list with the names of candidates retained in the selection procedure.
5. In the framework of the Junior Professional Programme:
Personnel number, First name/Surname, Nationality, Gender, Date of Birth, Entry Date to the Commission/Executive Agency, Employment Type, Grade, Professional experience.
6. During the **recruitment phase** for Contract Agents and Temporary Agents the following documents and personal data may be requested to constitute the recruitment file:
- a. Prior to entry into service
 - If a candidate comes from another EU institution/body or agency, REA HR requests the personal file in order to complete the grading. If, during the grading exercise further documents are required, these are requested from the candidate and then uploaded into the “Numérisation des Dossiers Personnels” (NDP) (once the candidate enters into service). If the candidate is entering into service in the European Institutions at REA, the full file of documentation provided by the candidate is uploaded into the NDP.

Depending on the candidate’s situation, the following information may be requested:

- A copy of a document proving the citizenship (e.g., passport, identity card or any other official document specifying citizenship) of the data subject;
- A copy of the data subject's birth certificate;
- Copies of the birth certificate(s) of the data subject's child(ren) (if applicable);
- A copy of the marriage certificate or recognised partnership or divorce/legal separation judgments (if applicable);
- Original recent extract of criminal record issued for a public administration by the police or by a relevant administration. Candidates will be asked to provide a criminal record extract for their current country of residence and their former country of residence if they have been in their current country for less than 6 months. Once a candidate submits the criminal record extract to REA HR, the extract is checked and then the email and attachment are securely filed in the REA-HR-SELECTION-RECRUITMENT Functional Mailbox and on the HR Limited Access Share drive (LIMACC). The extract is uploaded onto the candidate’s NDP;
- A document proving that the data subject has fulfilled his obligations concerning either compulsory military service or civilian service (if applicable);
- A medical aptitude certificate: following a successful selection and acceptance of offer letter, a medical visit is compulsory prior to the entry into service of a Contract Agent or Temporary Agent. REA HR is in charge of organising an appointment with the medical service of the Commission. There is no need of a medical aptitude certificate for a candidate coming from another EUI, body or agency if there is no interruption between two

contracts (there can be a maximum of six months interruption between contracts). The recruitment process can only proceed once the medical clearance is received.

- Copies of the diploma(s) attesting a successful completion of the required level of education for access to the function group and of any other diplomas obtained;
- Copies of professional training certificates;
- Documented evidence of the candidate's professional experience clearly indicating starting and finishing dates, full time/part time and the nature of the duties carried out (e.g., employment contracts, employers' references, payslips);
- Financial identification form containing account name, address, name of bank, branch address, account number and IBAN code;
- Legal entities form containing title, name(s), surname(s), address, VAT number, passport number, date, place and country of birth, phone number, and e-mail address;
- Badge request form containing status, grade, step, nationality, validity of identification document, brand, type and registration plate number of car;
- Declaration of conflict of interest and confidentiality of a recruited agent: first name, surname, signature. Personal data (that cannot be defined in advance) may be referenced by the selected candidate in the relevant free-text field of the form in case he/she believes that there is a potential conflict of interest.
- Declaration of conflict of interest and confidentiality for REA staff in service: first name, surname, signature, function. Personal data (that cannot be defined in advance) may be referenced by the selected candidate in the relevant free-text field of the form in case he/she believes that there is a potential conflict of interest.
- The Head of Department D, relevant Head of Unit and the Director may be involved if an actual or potential conflict of interest is identified;
- Declaration of conflict of interest for current REA staff: first name, last name, signature. The Head of Department D, relevant Head of Unit and the Director acting as AECC may be involved if an actual or potential conflict of interest is identified;
- AECC decision with determination of individual rights (obtained from the PMO).

b. Databases/Files

- In REA HR support files and databases (e.g., SYSPER¹⁸/RETO) the following data may be processed: name, surname, gender, date of birth, unit, status, category, grade, step, function group, nationality, personnel number, office of the entry into service, start date, end date, private address, mobile telephone number, e-mail address, etc.

c. Data processed during and at the end of the career of the data subject

- Throughout their career, the staff member has to notify REA and/or PMO of any change in his/her family/individual situation in order to benefit from

¹⁸ [Sysper Data Protection Notice](#)

the rights he/she might be entitled to but also to comply with his/her obligations vis-à-vis the Agency.

- Where a staff member submits a request for change in family/individual situation, the corresponding update to Sysper is performed by REA, by DG HR or by PMO depending on the nature of the update.
- Further staff member may change in SYSPER his/her contact details, and introduce other information (e.g., languages, contact person, address etc.).
- Renewal of contract: the personnel file under SYSPER is updated.
- Non-renewal of contract: a letter signed by the AECC is provided to the concerned agent. The letter is accompanied by the relevant forms to be used by the data subject for applying for an unemployment benefit. The PMO is also informed.
- In case an agent decides to leave the Agency, he/she needs to send a resignation letter to the Director. Once the resignation is accepted by the authorising officer the form Departure Leave absence is sent to PMO, REA GBI, REA LSA, REA VACANCIES, REA HR STAFFING, REA TIME MANAGEMENT, REA ABAC LPM, REA SALARIES. SYSPER is also updated. The agent is also requested to sign a declaration on obligations related to outside activities and assignments on leaving the service and to return his/her badge.

7. Declaration of disability and request for special assistance or challenge to selection result:

Information can be given about any disability requiring individual measures to be taken enabling the data subject to take part in the selection interview.

REA does not request medical data or medical certificates from candidates, Contract Agents/Temporary Agents, Blue Book Trainees or Interim Agents. However, if Contract or Temporary Agent candidates request adjustments to a testing environment, or challenge the result of a selection, REA may request further details or may request the submission of a medical certificate to the Medical Service to ensure the equal treatment of candidates. In such specific situations, the Medical Service may be involved to oversee the granting of specific conditions or adjustments for candidates.

In exceptional cases where such data are spontaneously submitted by a candidate or agent, Interim Agent or Trainee, these data will not be retained by REA.

8. Online testing platform¹⁹

Where Temporary Agent or Contract Agent candidates are invited to participate in an online written test and/or computer-based tests, organised by the external service provider, TestReach, additional data may be processed. REA HR will communicate to candidates all necessary information on the collection of personal data by TestReach. This information will include the processes for the test (what is involved), the personal data to be processed by TestReach including the TestReach Privacy Policy, as well as the data collected during the

¹⁹ Currently REA uses TestReach, however it could engage other external service providers.

test (image/voice capture during test for remote invigilation purposes in order to ensure the integrity of the test) and also any other specific rules for the test.

When a candidate logs into TestReach to take the test, they run through a system check that includes a check on their camera/video connection. Once the system check is complete, the candidate clicks on the start test link and begins a connection with their test supervisor. At this point, the video connection (and recording) is established. When a candidate connects to the supervisor, the supervisor advises them of the test rules and that the supervisor can see the candidate, hear the candidate and see the candidate's screen at all times during the test.

Candidates can obtain additional information regarding data security in the TestReach Privacy Policy: <https://www.testreach.com/testreach-privacy.html>

9. E-recruitment tool²⁰

A REA vacancy notice may specify that applications should be sent through the e-Recruitment tool, Talentsoft.

In such cases and in order to send an application, the candidate shall upload their CV, application form and eligibility grid, together with any other documentation specified in the call.

10. Joint selections

The processing in the context of the joint selections concerns only the selection phase until the establishment of reserve lists with the Agencies acting as joint controllers. The reserve lists are maintained and managed by the lead Agency and shared with the other participating Agencies. The recruitment processes are managed by each Agency and subject to their specific data protection records and notices.

Up to the establishment of the reserve list REA is responsible for responding to requests from data subjects. Once the reserve list is established, REA or the other participating Agencies will reply directly to the requests of data subjects.

11. Sharing of Contract/Temporary Agent reserve lists

The exact nature of the personal data shared among Agencies will depend on the information provided by individual candidates in their CV and motivation letter. The data may include those listed under point 1 of this section. The CV, motivation letter and application form are uploaded onto a central repository, which can be accessed by the Agencies.

If a Contract Agent candidate consents (for current reserve lists) or does not object (for future selections) to the sharing of reserve lists among Agencies, the reserve list may be shared on a central repository until the expiration of its validity. Temporary Agent reserve lists are shared among Agencies pursuant to the provisions of the TA (GIPS).

²⁰ Currently REA uses Talentsoft, however it could hire other external service providers.

Other data relating to the individual or comparative assessment of candidates during the selection phase of the Agency of origin will not be shared with other Agencies.

12. Reimbursement for travel costs

If a candidate has been invited to an interview or a medical appointment related to a REA recruitment procedure, they may be entitled to a reimbursement of travel expenses. The request for reimbursement of travel expenses may be submitted via an on-line web form hosted on secure servers of the Commission and accessible at:

https://ec.europa.eu/info/departments/european-research-executive-agency/reimbursement-travel-expenses_en

Candidates should submit their financial identification form, legal entity form, copies of flight or train tickets for travelling to and from the airport, and proof of accommodation, as well as a copy of their passport or identity card.

13. Interim Agents

The Interim Agencies provide REA with the CV of potential Interim Agents to be hired to work in different REA units, depending on the business needs and the profile/information submitted by the Interim candidate. The collection and processing are done electronically.

Typically, the data submitted include name, surname, date of birth, gender, nationality, contact details (address, email address and telephone number), work experience, education and training, personal skills, languages, classification (I, II or III) established by the Interim Agency. The precise nature of the data processed will depend on the data provided in the CV by the Interim candidate. They may provide their photograph on a voluntary basis.

For Interim Agents selected by REA, REA HR may encode or access data in Sysper: name, surname, place of birth, date of birth, personal number, nationality, gender, private address, mobile(s) and email address, office telephone number, civil status, administrative language and start date and end date of mission. The name of the Interim Agent will appear on the timesheets together with the name of the responsible person / HoU signing it, and the name of the responsible HR. Timesheets are approved e-mail.

A scan of a valid ID card (or passport) to identify the data subject is requested from candidates not yet registered in Sysper. Once registered, the scan is destroyed.

Data relating to a disability may be spontaneously provided by the Interim Agent to enable REA to take the necessary measures to facilitate the work of the person. No such data will be retained.

14. Blue Book Trainees

The data concerning the applications of Trainees is managed under the SLA with DG EAC and more precisely, the processing is covered under in the Joint Controllorship Arrangement (JCA) which is an integral part of this SLA (Annex 1). REA has access to the database of Blue Book Trainees to identify suitable

pre-selected candidates (Gestmax platform). REA does not control the data contained in the database and is only a recipient of the data.

As stated in the JCA:

“Article 3— PROCESSING ACTIVITIES, WHICH FALL OUT OF SCOPE OF THE JOINT CONTROLLERSHIP

3.2 The Traineeships Office acts as sole controller in relation to the management of applications via the Gestmax platform as well as the pre-selections of candidates based on DG EAC’s selection criteria.”²¹

The personal data available in Gestmax platform: name, date of birth, education, professional experience and linguistic skills and other personal data included in the CVs such as private address and telephone contacts of the candidates to a Traineeship. Other documents with personal data of the Trainee are held in Gestmax platform (ID card, diplomas, work experience, language skills) as well as the report of the Trainee at the end of the Traineeship.

REA only keeps the necessary data to proceed with the selection of the Trainee. The names of the Trainees to be recruited are identified in Gestmax platform. The Agency does not keep any personal data concerning the Trainees after the end of their Traineeship. Certificates and evaluation reports are stored in Gestmax platform.

In case of sickness absence, the Trainees must inform their supervisor and the service in charge of recording the absence in Sysper in the respective unit. In case of sickness absence for longer than 2 days, trainees must obtain a medical certificate. Trainees have an obligation to upload their medical certificate to their Blue Book Account (BBA). At the end of each month, during their traineeship session, the Traineeships Office sends these medical certificates to REA Traineeships Coordinator. The Traineeships Office has no access to Sysper of Trainees, only the agencies have access right to Sysper of their trainees. The Traineeships Office does not verify medical certificates of trainees. REA is responsible for validating the absence of Trainees in Sysper and the verification of the medical certificates. Once verified, medical certificates will not be retained by REA.

No medical documentation or information should be provided by the Trainee to REA Time Management. Any medical certificates received by REA for absences will not be retained.

15. Unsolicited applications

Where REA receives unsolicited applications from candidates applying outside the standard recruitment procedures for Contract Agents or Temporary Agents, or from Blue Book Trainees or Interim Agents, these candidates are informed to apply through the established channels. Data received from such candidates are deleted.

1.9. Retention time (time limit for keeping the personal data)

²¹ The Commission record covering these operations is available at <https://ec.europa.eu/dpo-register/detail/DPR-EC-01746>

REA applies the principles and retention periods indicated in the Common-Level Retention List for European Commission Files (CRL) by analogy: ([Common Retention List Annex.pdf \(europa.eu\)](#)):

- a. The selection files that are part of the personal file of the staff member concerned will be retained for 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 (CRL 12.3.7).

Files documenting the organisation of selection procedures - 5 years (CRL 12.3.4):

- Files documenting the organisation of competitions: notices of competition, compositions of the selection committee, letter appointing the selection committee, declarations of confidentiality or conflict of interest of selection committee members, invitations to meetings, minutes, evaluation sheets, written tests of candidates, instructions for the selection committee, minutes and references to disputes;

Files on candidates for posts as Contract Agents or Temporary Agents (reserve list) - 2 years (CLR 12.3.4):

- Personal data (application, CV, exams) will be retained for 2 years following the expiry of the reserve list in case of possible complaints;
- The reserve list will be valid for an initial period of twelve months following the conclusion of the selection procedure with a possibility for further extension by decision of the Director. Remaining successful candidates may receive an offer for employment if a similar position becomes available within REA;
- A distinction is drawn between recruited and non-recruited applicants on the reserve list. The information related to recruited applicants is stored in their personnel file. The file of non-recruited applicants is closed once the reserve list has expired.

- b. Candidates invited to an interview, but not included in the final reserve list
Personal data will be kept for 5 years following the conclusion of the selection procedure, in case of possible complaints (CLR 12.3.4).

- c. Candidates not invited to an interview

Personal data will be kept for 5 years following the conclusion of the selection procedure in case of possible complaints (CLR 12.3.4).

- d. Reimbursement of travel expenses

If a candidate is invited to an interview or a medical appointment related to a REA recruitment procedure, or a hearing in the context of evaluations, they may be entitled to a reimbursement of travel expenses. The request for reimbursement of travel expenses may be submitted via an on-line form hosted on secure servers of the Commission and accessible at: https://ec.europa.eu/info/departments/european-research-executive-agency/reimbursement-travel-expenses_en.

The documents related to the reimbursement of travel expenses (financial identification and legal entity forms) are processed and filed by the Security, Logistics and Administrative Finance Sector of unit D.2 "People and Workplace." The retention period for financial files is 5 years after the budget discharge. (CRL 4.2.4)

- e. Online testing platform

TestReach keeps the personal data collected during the online testing for a period of 6 months from the written test, after which it is anonymised. TestReach keeps the video (image/voice) data for a period of 6 months after the written test. After that period, videos are securely deleted. If REA requests that a video is returned to the Agency (e.g., in case of appeals by candidates or in case an incident occurs during the test and the test is suspended), the recording will be retained securely by REA, in a limited access file and only for the time necessary to handle the incident or complaint/litigation.

f. E-recruitment tool

Talentsoft will retain the data for five years pursuant to the Enterprise Licence Agreement starting from the payment of the balance of the last Specific Contract issued under the agreement.

g. Joint selections

The reserve list resulting from a joint selection will be held by the lead agency AECC and shared with the other Agencies. The period of validity of the resulting reserve list will be determined by the lead Agency.

h. File on Trainees – 2 years (CLR 12.3.8)

For non-recruited candidates the personal data will be stored for a maximum period of two years.

Documents related to recruited candidates are kept in the Trainee's personal file, and are kept for two years after the end of the Traineeship at the Agency, provided there are no pending claims or any other open issues.

i. File on Interim Agents – 2 years

CVs are kept 2 years as from reception according to CLR 12.3.4. Unsolicited applications are not retained.

REA does not keep a copy of the contracts.

The timesheets of the Interim Agents are kept as supporting documents for the checking and payment of the invoices in Ares (according to the Financial Regulation, the retention period for files concerning management expenditure is 10 years).

The documents related to the Interim Agents hired by REA are essentially financial documents (order form, check list, supporting documents). These correspond to category 4.2.2 "Management of Expenditure" of the CRL, which foresees an administrative retention period of 10 years.

Working documents relating to the day-to-day HR management of recruited Interim Agents (such as monitoring tables and budgetary follow-up) will be kept for two years.

j. Day-to-day management of human resources - 4 years (CLR 12.3.14)

Files on staff management, allocation of vacant posts, leaves, etc., created for the sound management of human resources in the department concerned.

k. Sharing of reserve lists

The data of candidates on reserve lists will be shared among Agencies until the date of expiration of the reserve list. AECC of the Agency of origin may extend the period of validity of a reserve list. Each Agency of origin is responsible for updating the central repository and for ensuring that the data contained therein are regularly updated.

For pre-existing reserve lists, the explicit consent of candidates will be retained by the Agency of origin for a period of 5 years following the closure/removal of the reserve list from the central repository. CLR 12.3.4.

Is any further processing for historical, statistical or scientific purposes envisaged? **Yes**

Anonymised data relating to applicants and recruited staff is used for statistical purposes. An annual report with overall figures is produced every year to analyse and compare the recruitment process of the Agency.

1.10. Recipients of the data

Within REA:

1. **During the selection phase**, the following recipients in REA may have access to these data:
 - Members of the Selection Committee;
 - Assessors and Observers to a selection procedure (if applicable);
 - REA Head of HR Unit (D.2 "People and Workplace");
 - REA Head of Department D "Coordination and Corporate Services";
 - REA Selection & Recruitment Sector;
 - REA Security, Logistics and Administrative Finance Sector of D.2;
 - REA Director;
 - REA Heads of Unit, Deputy Heads of Unit and Heads of Sectors;
 - REA Internal Services (finance, ICS, legal service).
2. **During the recruitment phase**, the following recipients in REA may have access to these data:
 - The designated staff in REA HR, dealing with the recruitment file, access and process personal data;
 - REA Head of HR Unit (D.2 "People and Workplace");
 - REA Head of Department "Coordination and Corporate Services";
 - REA Director;
 - As appropriate, and in line with the SLAs in place, only the necessary information is transferred to services of the European Commission: PMO (e.g. for salary), Medical Service (e.g. pre-recruitment medical visit organisation.), OIB (e.g. for the management of office space), DG DIGIT (for the IT account and materials) and DG HR-Security (e.g. for the issuing of service cards and management of accesses to the building).
3. **Recipients having access to the data in the Gestmax platform:**

- REA Traineeship Coordinator, REA Trainee Supervisor, Recruiter and Advisor;
- REA HR authorised staff;
- REA Management (concerned Heads of Department, Heads of Unit, Heads of Sector and Director).

4. Recipients having access to data relating to Interim Agents

- REA HR authorised staff;
- REA Management (concerned Heads of Department, Heads of Unit, Heads of Sector and Director)

Outside REA:

- Authorised staff of TestReach and Talentsoft (or of other external contractors): the transmission of data is restricted to the information necessary for the legitimate performance of tasks (with a need to know). The recipients of the data are contractually obliged not to use the data received for other purposes than the one for which they were transmitted. They are bound by confidentiality obligations established by contract.
- Reserve lists for Contract Agents and Temporary Agents may be shared among Agencies, upon the decision of the Director and upon data subject's consent, where needed. The other agencies will be recipients of the data.
- For Blue Book Trainees: authorised staff of the Traineeships Office that control the data submitted by candidates to the Gestmax platform.
- For Interim Agents: Randstad Belgium, Start People and Daoust (or other Interim agencies).
- Authorised staff of the European Commission, where applicable (e.g. for the purposes of the JPP: the Directorate-General for Human Resources and Security – Unit HR.B.1)

In addition, data may be disclosed to public authorities²², which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law and shall not be regarded as recipient:

- 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;
- The European Anti-Fraud Office (OLAF) in case of an investigation conducted in application of Regulation (EC) No 1073/1999;
- The Internal Audit Service of the Commission (IAS) within the scope of the tasks entrusted by Article 118 of the Financial Regulation and by Article 49 of the Regulation (EC) No 1653/2004;
- The European Court of Auditors (ECA) within the tasks entrusted to it by Article 287 of the Treaty on the Functioning of the European Union of the EC Treaty and Article 20, paragraph 5 of Regulation (EC) No 58/2003;

²² These public authorities shall not be regarded as recipient in accordance with Union and Member State law.

- The European Ombudsman (EO) 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 (EPPO) 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.

The processing of those data by those public authorities shall comply with the applicable data protection rules according to the purpose of the processing.

This transmission will be restricted to the information necessary for the competent entity to carry out its task that will process those data only for the purposes for which they have been transmitted. Any recipient of the data shall be reminded of their obligation not to use the data received for other purposes than the one for which they were transmitted.

1.11. Transfers of personal data to third countries or international organisations

Due to the use of externally hosted online learning-related platforms, third party tool or video-conferencing tools like Webex, Skype for Business, Microsoft Teams and similar, personal data of the participants may be transferred outside the EU/EEA; they act as data controllers.²³

1.12. High-level description of security measures

1. General measures

Personal data of applicants is stored electronically (previously on paper) and accessible only by the authorised personnel for the purposes of the selection and recruitment of candidates on a strictly need-to-know basis. REA HR staff having access to the data are strictly bound by confidentiality and sign a confidentiality declaration.

All data in electronic format (emails, documents) that are processed are stored either on the servers of the European Commission or REA. Access to electronic files is protected via the Commission security measures (use of password and ECAS authentication system).

- Electronic archives are kept in REA Human Resources restricted Shared Drive and Functional mailbox and are only accessible by designated staff members on a need-to-know basis.
- The CV, the motivation letter/application form and the eligibility grid is saved in the LIMACC, in a dedicated folder on the functional mailbox and on a restricted access SharePoint for the Selection Committee members. Once the selection procedure is finalised, the documents are removed from the SharePoint and saved securely on the restricted Shared Drive.
- Members of the Selection Committee are responsible for maintaining the confidentiality of any documents or electronic files sent to them. SC members sign a general conduct declaration referring to these obligations. They are requested to return, erase or destroy all confidential documents or files

²³ Please see [Microsoft Privacy Statement – Microsoft privacy](#) and [Microsoft-365-privacy-statement.pdf \(europa.eu\)](#)

received or copies. Any correspondence among Selection Committee members or between REA HR and SC members is via SECEM.

- Selection documentation is stored on a dedicated SharePoint with access only granted to the members of the Selection Committee and authorised HR staff. Once the selection procedure is finalised, all documents related to the procedure are deleted from the SharePoint and saved on the LIMACC.
- For selected candidates, individual personal files are created and stored in secure archives that are accessible only to authorised staff.
- Recruitment documentation is stored in the functional mailbox and on the LIMACC. Both are only accessible by authorised staff members on a need-to-know basis.

2. Joint selections

The reserve lists and information on candidates (as contained within the CV, motivation and application form) are jointly processed by the participating agencies, hosted on the servers of the European Commission and of the participating Agencies. Staff are only involved on a strictly need-to-know basis.

3. Online testing tool (TestReach)

TestReach acts as the processor of REA and keeps the personal data collected for a period of 6 months from the written test, after which it is anonymised. TestReach stores all candidate data and videos within a secure hosting environment. The data are held only within the European Union with the primary servers in Dublin and backup servers in Frankfurt. Videos are treated with the same high degree of security as the entire TestReach application and database. There are no third-party access rights to the data stored. Access to candidates' data is restricted to specific employees with a need to know. A Data Protection Agreement covering security aspects and adherence to the General Data Protection Regulation and to Regulation 2018/1725 has been signed between REA and TestReach.

4. Specific measures for the e-Recruitment tool (Talentsoft)

- Data entered by the candidates in the e-Recruitment tool is secured and only accessible by authorised staff members of REA HR and designated Selection Committee members.
- The access to the e-Recruitment tool is done via a secured platform and using an individual password. The access to the personal data is protected by the management of the access rights which are strictly limited to specific user groups with a need to know. Consequently, the access rights are continuously updated in accordance with any change in REA HR personnel.
- Candidates are able to log into the platform using a secure and unique username and password.
- The datasets are safeguarded in the Data Centres of the contractor, and therefore covered by the numerous defensive measures implemented to protect the integrity and confidentiality of the electronic assets. Data centres are only based in the EU.
- The ELA with the contractor provides for obligations to ensure data protection (e.g., confidentiality, measures to take in case of data breach, no data stored outside the EU etc).

- If a candidate does not update their profile after a two-year period and does not update following the expiry of a 10-day reminder period, all personal data is anonymised by the contractor for the purposes of statistical reporting and can therefore not be linked to the candidate.

5. Specific measures for Trainees:

The selection of candidates for a Traineeship, is done via the Gestmax platform. Access to data is restricted to the REA Traineeship Coordinator and to the recruiting units as well as the Director on a need-to-know basis. The access to the database is protected by a password and managed by the Traineeship Office. Personal data of pre-selected candidates are stored in the Gestmax platform under the sole responsibility of the Traineeship Office. This platform is accessible to all services of the Commission and to Agencies and provides access to restricted information. Data processing by the Agency concerns only the selection from Gestmax platform.

6. Specific measures for the sharing of reserve lists

The reserve lists and data of candidates are shared by the Agency of origin via a secure repository hosted on the servers of the European Commission/Agencies. The Memorandum of Understanding specifies that access to this repository will be restricted to authorised staff with a need to know, as determined by the HR services of each Agency.

Further security measures for selection and recruitment activities are detailed within the Records and Data Protection Notices of each Agency.

1.13. Data Protection Notice

A Data Protection Notice (DPN) relevant to this data processing is available in the https://rea.ec.europa.eu/public-central-register-data-protection-records-rea_en and it is transmitted by the data controller to the data subjects, where applicable.