



## Record of processing activities regarding interim staff services for the European Institute of Innovation and Technology

Nr	Item	Description
1	Reference number	DPO-18
2	Name of the data controller, the data protection officer and processor, if applicable and contact details	<p>The <b>data controller</b> is the Head of Services and Finance Unit.</p> <p>Contact e-mail: <a href="mailto:HR@eit.europa.eu">HR@eit.europa.eu</a></p> <p>The <b>data processor</b> is the external service provider<sup>1</sup> supporting the EIT in the selection and recruitment of interim staff.</p> <p>The <b>Data Protection Officer</b> of the EIT is Nora TOSICS.</p> <p>Contact e-mail of <b>Data Protection Officer</b>: <a href="mailto:EIT-DPO@eit.europa.eu">EIT-DPO@eit.europa.eu</a></p>
3	Purposes of the processing	Personal data is collected for the purposes of managing the applications at the various stages of the selection process, selecting and recruitment of interim staff members with the support of an external service provider.
4	Categories of data subjects	The data subjects are the applicants for interim positions at the EIT. At the EIT interim members are engaged for a certain period and employed by an external service provider.
5	Categories of the personal data processed	The following types of personal data are processed:

<sup>1</sup> Currently, the EIT has a Framework Contract signed with Starjobs Hungary Ltd.



		<ol style="list-style-type: none"><li>1. By the EIT and by the service provider (i.e. the data processor) as well:<ol style="list-style-type: none"><li>a. Personal data provided by the candidate allowing identification of him/her (surname, first name, date and place of birth, gender, nationality);</li><li>b. Motivation/cover letter provided by the candidate;</li><li>c. Contact information provided by the candidate to allow the practical organisation of the interviews (street, postcode, town, country, telephone number, fax, e-mail address)</li><li>d. In case of recruitment, the selected candidate is requested to sign a Declaration on confidentiality and absence of conflict of interests</li><li>e. Information concerning special needs (disability), if applicable.</li></ol></li></ol> <p>The EIT and the external service provider do not require the applicants to submit any special category of data listed in Article 10 of the Regulation as part of the selection and recruitment procedure. If participants decide to share such information for example by means of attaching a photo to their CVs this is done with unambiguous and explicit consent of the data subject.</p> <ol style="list-style-type: none"><li>2. By the external service provider (data processor) exclusively:<ol style="list-style-type: none"><li>a. Data providing evidence of the candidate not falling under exclusion circumstances for the signature of an employment contract relating to suspected offences, offences, criminal convictions or security measures at the recruitment stage at the end of the selection procedure (e.g. the criminal record);</li><li>b. Financial information (for instance, bank account details);</li></ol></li></ol>
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		<p>c. Employment record.</p> <p>For more information, please refer to the privacy statement of the service provider: <a href="https://starjobs.hu/adatvedelmi-nyilatkozat">https://starjobs.hu/adatvedelmi-nyilatkozat</a></p>
6	Categories of data recipients	<p><b>Within the EIT:</b></p> <p>The personal data of the candidates is processed by the responsible EIT staff: HR staff, members of Selection Board, staff of the Procurement Section, responsible Head of Unit and/or Head of Section, Head of the Director’s Office, the Director and the Legal Officer (only in case of a complaint).</p> <p>Access will be given to the Internal Auditor of the EIT by request and if necessary for the performance of the duties of the Internal Auditor: depending on the nature and the scope of the specific audit, the Internal Auditor will be given access to personal data which is relevant for and serves the purpose of the specific audit exercise.</p> <p><b>Within the Commission and other EU institutions/agencies/institutions:</b></p> <p>Authorised staff of the following EU institutions may have access to relevant personal data for audit control or investigation purposes: Court of Auditors, Internal Audit Service of the European Commission, European Anti-Fraud Office (OLAF).</p> <p>For the purpose of handling review procedures and litigation, access to the personal data may be granted to the Legal Service of the European Commission, the European Ombudsman, the European Data Protection Supervisor, the General Court, the</p>



		<p>European Court of Justice upon request and to the extent necessary for handling the review procedure and litigation.</p> <p><b>Third parties subject to the GDPR<sup>2</sup> and third parties not subject to the GDPR:</b></p> <p>The personal data of the applicants are processed by the personnel of the external service provider in charge of the selection and recruitment of interim staff members for the EIT. The EIT has a written framework service contract with the external service provider, which contains several provisions on the protection of personal data.</p> <p>The subcontractors of the external service provider can be found in the privacy statement of the service provider: <a href="https://starjobs.hu/adatvedelmi-nyilatkozat">https://starjobs.hu/adatvedelmi-nyilatkozat</a></p> <p>Exceptionally and if necessary, information concerning the interim staff selection procedure may be disclosed to external lawyers (advocates) subject to the GDPR, for specific and limited purposes only. In this case a written contract (service contract) is signed between the EIT and the external lawyer in order to ensure that that Article 29 of the Data Protection Regulation of the EU institutions is respected by the data processor. These written contracts follow the model of the Commission and include a specific article on data protection.</p> <p>The same applies to external IT contractors with whom the EIT has a framework contract in order to provide IT services for the EIT.</p>
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<sup>2</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)



7	Time limit storage	<p>1) <u>Data of successful applicants</u>: the personal data of the recruited interim staff members is stored in the personnel file throughout the secondment to the EIT. The personnel files will be retained for a period of 7 years after the budget of the EIT for the costs of the of interim staff service provision is discharged in accordance with the EU Financial Regulation.<sup>3</sup></p> <p>2) <u>Data of unsuccessful applicants</u>: the personal data of the unsuccessful applicants will be kept for 2 years from the official starting date of the interim position for the purposes of potential review procedures concerning the selection and review procedure, and for budgetary and audit purposes. In case the length of the review procedure exceeds the period of 2 years, the relevant data are kept for the duration of the ongoing review procedure.</p> <p>3) <u>Spontaneous applications</u> shall be eliminated at latest after 2 years following the day of receipt.</p> <p>The documents necessary for financial/budgetary purposes (e.g. documents relating to the reimbursement claim of travel expenses) and audit purposes are kept for a period of 7 years as from the date of the discharge of the corresponding EIT budget.</p>
8	If applicable, transfers of personal data to a third country or to international organisation (if yes, the identification of that third country or international	No

<sup>3</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



	organization and the documentation of suitable safeguards)	
9	<b>General description of the technical and organisational security measures</b>	<p>The personal data of the candidates is processed only by the responsible EIT staff indicated above (restricted access). Hardcopy files are kept in the locked cupboards.</p> <p>The Framework Service Contract signed with the external service provider contains several provisions on the protection of personal data, including provisions on organisational and technical measures.</p>
10	<b>For more information, including how to exercise rights to access, rectification, object and data portability (where applicable), see the data protection notice:</b>	<p>Please consult the Data Protection page on the EIT's website:</p> <p><a href="https://eit.europa.eu/who-we-are/legal-framework/data-protection">https://eit.europa.eu/who-we-are/legal-framework/data-protection</a></p> <p>Privacy statement of the current external service provider:</p> <p><a href="https://starjobs.hu/adatvedelmi-nyilatkozat">https://starjobs.hu/adatvedelmi-nyilatkozat</a></p>

Signature of the data controller

(Approval is given via a workflow in ARES in place of a handwritten signature)

Annex: privacy statement