

# Record of processing activity

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## Recruitment of Temporary and Contract Agents and Seconded National Experts

Record of EBA activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 (EUDPR)

### Part 1 - Article 31 Record (publicly available)

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1	<b>Last update of this record</b>	11/03/2024
2	<b>Date of next review</b>	11/03/2026
3	<b>Reference number</b>	EBA/DPR/2020/8
4	<b>Name and contact details of controller</b>	Controller: European Banking Authority, Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France  Responsible Department: Operations, Human Resources Unit  Contact: EBA-vacancies@eba.europa.eu
5	<b>Contact details of DPO</b>	<a href="mailto:dpo@eba.europa.eu">dpo@eba.europa.eu</a> , or alternatively send a letter to the postal address of the EBA (address above) marked for the attention of the DPO of the EBA.
6	<b>Name and contact details of joint controller (where applicable)</b>	Certain recruitment procedures are conducted jointly with the other Agencies. These recruitment procedures are expressly labelled as joint. The information on the joint data processing is provided in the Specific Data Protection Notice.
7	<b>Name and contact details of processor (where applicable)</b>	The data is processed by the following external providers mainly for the selection of Temporary agents (TA) and Contract agents (CA): <ul style="list-style-type: none"><li>Contractors providing services for the invigilation of online written tests: TestReach. Contact: <a href="mailto:info@testreach.com">info@testreach.com</a> Their privacy statement is found at: <a href="https://www.testreach.com/testreach-privacy.html">https://www.testreach.com/testreach-privacy.html</a></li><li>Contractors providing services to the EBA for the assessment of candidates at an assessment centre for</li></ul>

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middle management functions: Price Waterhouse Coopers EU Services.

Contact: [be.privacy@pwc.com](mailto:be.privacy@pwc.com)

Their privacy statement is found at:  
<https://www.pwc.be/en/online/privacy-statement.html>.

- EPSO in the case of organising a recruitment procedure on the EBA's behalf or if the EBA recruits from EPSO's electronic contract agent database.

Their privacy statement is found at:  
<https://eu-careers.europa.eu/en/protection-your-personal-data>

- The external contractor, Adequasys, providing the Allegro system that is the EBA's HR Management tool including the e-recruitment module, and carrying out its customisation for the EBA.

Contact: [dpo@adequasys.com](mailto:dpo@adequasys.com)

- The European Commission (EC) is the processor for the services offered to the EBA, in accordance with the signed service level agreements. The EC carries out tasks (manage appeals) supporting the recruitment process. Candidates who consider that their interests have been prejudiced by any decision related to a selection procedure may lodge a complaint under Article 90(2) of the Staff Regulations within the time limits provided for. These complaints are managed by the European Commission.

For enquiries, EC DPO:

[data-protection-officer@ec.europa.eu](mailto:data-protection-officer@ec.europa.eu)

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8	<b>Short description and purpose of the processing activity</b>	The EBA collects and processes personal data for the purposes of selection and recruitment of staff to carry out its tasks and functions. The recruitment process involves several steps, including the screening of CVs and applications, conducting tests and interview meetings, and for selected candidates the appointment of a candidate to a vacant post.
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The processing aims to manage, collect, and monitor how the personal data of applicants are used and processed during the different phases of the selection procedures. The goal of the selection procedures is to identify the most suitable candidate(s), manage and check the use of the reserve lists, and ensure that all steps of the procedure are carried out according to the EU Staff Regulations and implementing rules.

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Certain selection procedures can be organised jointly with other Agencies.

In addition, personal data may be processed for internal or external mobility opportunities offered by the EBA. In these cases, personal data is also collected from internal staff members who indicate their interest to participate.

The legal basis of the processing is:

- Regulation (EU) No 1093/2010 (the EBA Regulation);
- Regulation No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials, in particular Articles 2(a), 2(f), 3(a), 12 to 15, 27 to 34 of the Staff Regulations and Articles 82 to 84 CEOS;
- Decision EBA/DC/2015/126 of the Management Board of 15 September 2015 laying down general implementing provisions on the procedure governing the engagement and the use of temporary staff under Article 2(f) of the Conditions of Employment of Other Servants of the European Union;
- Decision EBA DC 239 of the Management Board of 12 September 2018 on middle management staff;
- Decision EBA DC 284 of the Management Board of 16 August 2019 on the 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 under the terms of Article 3a thereof;
- Decision EBA DC 304 of the Management Board of 13 December 2019 on the Secondment of National Experts;
- Decision EBA/DC/2015/119 of 08 May 2015 on reimbursement of travel and subsistence expenses for persons invited by the EBA to an interview, examination, second interview or a pre-employment medical examination.

9 **Description of categories of persons whose data the EBA processes and list of data categories**

The EBA processes the personal data of all candidates applying for vacancies of temporary and contract agents and seconded national expert, as well as EBA staff that expressed interest in internal or external mobility.

Personal data processed depends on the stage of the procedure that the candidate reached.

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The EBA may process the follow personal data:

**Identification data:** Information provided by the candidate to allow themselves to be identified such as name, address, date of birth, place of birth, gender, nationality, ID numbers, picture. If a candidate receives an invitation for an interview and/or written test, the following data will be processed: Identity card/passport.

**Contact data:** email address, phone number.

**Education and Training data:** Start and end dates, title of qualification awarded, diploma (level in the national and/or international classification), name and location of the organisation providing the education or the training, main study subjects or occupational skills covered.

**Languages:** Including, for each language, the level in understanding, speaking and writing the language.

**Other skills or information:** Communication skills, organisational/managerial skills, job related skills, digital skills including a self-assessment on information processing, communication, content creation, safety, problem solving and knowledge of computer software, commitment to adhere to any security checks, if necessary, and any other additional information the candidate declares in a spontaneous basis or would like to annex to the application.

**Employment data:** Start and end dates, position/title held, employer information (name, address), description of the position (detailed description of the work, main activities and responsibilities), contracts/certificates/ reference letters from previous and current employers, payslips.

**Demographic data:** Age, marital status.

**Financial Data:** Legal entity and bank account details for the reimbursement of expenses. Information and documents provided by the candidate to support claims for the reimbursement of travel costs related to the interview and/or written tests or attendance at a middle management assessment centre are also handled: A completed and signed declaration of expenses form and the supporting documents listed in the form (tickets, e-ticket, train or bus tickets, copy of the travel agency invoice) and evidence of costs incurred for accommodation as well as the legal entity and bank account details.

**Other data:** Any other personal data provided by the candidate (need for special arrangements to participate in the selection procedure).

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10	<b>Special categories of personal data processed (as defined in Article 10 EUDPR)</b>	No special categories of personal data are specifically required from the candidates.
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11 **Time limit for keeping the data**

The data will be retained for varying periods depending on the outcome of each application:

- Successful candidates: the data will be stored for ten years as of the termination of employment or as of last pension payment as per Article 26 of the Staff Regulations.
- Candidates included on a reserve list but not recruited: the data will be stored for the duration of the validity of the reserve list and then for the three years following the expiry of the reserve list's validity.
- Non-successful candidates: the data will be stored for three years following the Appointing Authority's decision on the offer to be made. The time-limit for storage of data is set in relation to the time-limits to be established for the possible review of the decision taken in the selection procedure (complaint to the European Ombudsman, appeal with the Civil Service Tribunal), as well as in accordance with Article 49 of the Implementing Rules to the Financial Regulations (for budgetary and audit purposes).
- Applicants invited for an assessment centre (Temporary Agents Middle Management positions): the contractor retains the assessment report, the CVs of the candidates and an automated report of the psychometric computer tests for as long as required by the data controller.

In the case of a formal appeal, all data held at the time of the formal appeal will be retained until the procedure is completed.

12 **Recipients of the data**

The personal data of candidates will be accessible to the following:

- The relevant EBA Human Resources staff members;
- The members of the Selection Board;
- The Directors of Department/Heads of Unit and/or delegated staff of a recruiting department/unit who will consult the CVs and motivation letters of candidates on a relevant reserve list;
- The Appointing Authority, i.e., the EBA's Executive Director;
- The Finance and Procurement Unit's staff members handling the reimbursement of travel costs linked to the interview and/or written test or attendance at a middle management assessment center or a pre-employment medical examination and the Accounting Officer.

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Also, if appropriate, access will be given to the specialised members of the ICT Unit involved in the management of the Human Resources processes and the EBA's Legal Unit in the case of complaints.

In addition, the certain sets of personal data will be accessible to the external contractor involved in the selection procedure.

If required, access will be given to EU staff with the statutory right to access the data required by their function, i.e. the European Ombudsman, the Internal Audit Service, the European Court of Auditors, OLAF and the European Data Protection Supervisor.

If required, limited personal data of EBA can be shared with the members states administrations.

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<p>13 <b>Are there any transfers of personal data to third countries or international organisations?</b></p>	<p>The personal data are processed by the EBA within the EU/EEA.</p>
<p>14 <b>General description of security measures, where possible</b></p>	<p>Processing is performed under the EBA Information Security Framework. Processing of personal data in the context of this processing activity is carried out pursuant to the EBA Decision (EBA/DC/138) of 29 October 2015 on the security of communication and information systems in the EBA. The EBA adopted Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission. Those security controls include access control and authentication policy and technical controls; backup; audit trails; physical security policy and technical controls; patch management policy.</p>
<p>15 <b>For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:</b></p>	<p>The data protection notices are provided to the data subjects within the specific vacancy notices. In certain cases, the specific data protection notice can be communicated individually to the data subjects. The general data protection notice is also available on the EBA website.</p>

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