

# DATA PROTECTION NOTICE ON THE ENGAGEMENT OF TRAINEES

#### 1. Introduction

Personal data provided in connection with the engagement of trainees are processed in accordance with Regulation (EU) 2018/1725 of the European Parliament and of the Council 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 (hereinafter referred to as 'Regulation no. 1725/2018' or 'EDPR')¹.

The Head of the Human Resources is the staff member responsible for this processing operation on behalf of the data controller (i.e. Eurofound).

#### 2. Why do we process your personal data?

Your personal data is processed for the purpose of preparing the selected candidates' files and finalising selection procedures launched to engage trainees.

#### 3. Which personal data do we collect and process?

The collection of personal data is done initially through a web-based application called 'eRecruitment', a platform owned by Oleeo Plc<sup>2</sup>, where the following data will be collected:

- Personal (identification and contact) details: name, surname, nationality, gender, date of birth, email address, postal address, phone number;
- Educational background, training skills, etc.;
- Career history/work experience;
- Level of knowledge of EU languages;
- Personal data related to the selection criteria set for each specific profile; and
- Additional information relating to a physical disability (at the discretion of the candidate);

<sup>&</sup>lt;sup>1</sup>. OJ L 295 21.11.2018, p. 39-98.

<sup>&</sup>lt;sup>2</sup> Oleeo Plc acts as the data processor on behalf of Eurofound in relation to the collection of your personal data through the e-Recruitment platform. For more information, please visit <a href="https://oleeo.com/">https://oleeo.com/</a>.



Data on motivation (in a motivation letter that is compulsory).

All successful trainees will also be required to provide the following information:

- Copy of passport or identity card;
- Copy of the diploma(s) or certificate(s) of the required level of education;
- Updated curriculum vitae; and
- Proof of sickness and accident insurance.

#### 4. What is the legal basis for processing your personal data?

The Agency runs an annual traineeship programme open to university graduates. The 'Rules governing the <u>2021 post-graduate traineeship programme</u> of the European Foundation for the Improvement of Living and Working Conditions' specify the rules governing the traineeship programme.

In addition, the processing of personal data is necessary for the management and functioning of Eurofound and, therefore, is lawful in accordance with Article 5(a) of the EDPR.

#### 5. Who has access to your personal data and to whom is it disclosed?

Your personal data may be disclosed to the following categories of recipients:

- HR Staff: Head of HR and other authorised HR staff administering the traineeship programme.
- Heads of Unit and their delegates responsible for interviewing applicants and choosing trainees. Each unit has access only to the applications for the profiles relevant to their unit;
- Members of the Finance unit responsible for payment of traineeship grants.
- Oleeo staff may have access to your data in order to provide technical support to candidates and Eurofound staff; and
- Any of the supervisory instances of the Agency (i.e. the European Court of Auditors, the Internal Audit Service, and in case of controversy, the European Union Civil Service Tribunal, the European Ombudsman, etc.) might be granted access to personal data of candidates upon request.

No other third parties will have access to your personal data, except if required by law.



#### 6. How long do we keep your personal data?

Applications for traineeships are retained for 2 years from the closing date.

#### 7. How do we protect and safeguard your data?

The Agency has several security controls in place to protect your personal data from unauthorised access, use or disclosure.

Online applications are stored in our secure online recruitment system ('e- Recruitment'), which is managed by Oleeo Plc.

An electronic administrative file is stored in Eurofound's secure electronic document and records management system (Microfocus Content Manager) on servers located in Eurofound's on-site data centre. In Eurofound, security restrictions are in place for access to data stored both in eRecruitment system and Microfocus Content Manager. Access is limited to the HR staff managing the traineeship programme and the colleagues assigned to selecting trainees for different profiles. Some data (e.g. relating to the issuing of invitation letters) may be stored temporarily on secured shared drives on Eurofound's network during the selection procedure. Physical files are stored by HR in physically secure areas such as locked cabinets, or confidentially destroyed as described above accessible only to authorised staff.

## 8. Do we transfer any of your personal data to third countries or international organisations (outside the EU/EEA)?

Oleeo's servers are located in the United Kingdom, a country which will leave the European Union from 1<sup>st</sup> January 2020 (i.e. international transfers of data will take place after this date). Eurofound is currently under negotiations with Oleeo to sign Standard Contractual Clauses <sup>3</sup>. If necessary, this data protection notice will be updated accordingly.

### 9. Does this processing involve automated decision-making, including profiling?

No decision is taken by Eurofound in the context of this processing activity solely on the basis of an automated processing of your personal data (i.e. processing without human

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<sup>&</sup>lt;sup>3</sup> 3 Article 48(3) (b) of the EDPR.

intervention, for example profiling [evaluating or predicting your behaviour using

automated tools]).

10. What are your rights as a data subject and how can you exercise them?

Within the limits set by the EDPR, you have the right to access, rectify, erase and/or port

your personal data, as well as to restrict or object to the processing of your personal data.

In order to exercise your rights, please contact in writing the Head of the Human at

frank.vanboven@eurofound.europa.eu whereby you shall specify your claim (i.e. the

right(s) you wish to exercise).

The exercise of your rights is free of charge. If your request is manifestly unfounded or

excessive, Eurofound may refuse to act on it.

Should you feel that the processing infringes the data protection rules, you are entitled

to raise complaint with the European Data Protection Supervisor

(www.edps.europa.eu). Please find the complaints form at

https://edps.europa.eu/dataprotection/our-role-supervisor/complaints/edps-complaint-

form\_en.

11. Who shall I contact in case of doubts?

Should you have any question or doubt on this processing operation, you should contact

the Head of the Human Resources at <a href="mailto:frank.vanboven@eurofound.europa.eu">frank.vanboven@eurofound.europa.eu</a>.

You may always submit queries, remarks or complaints relating to the processing of your

personal data to Eurofound's Data Protection Officer (DPO) by using the following

contacts:

Address: Wyattville Road, Loughlinstown, Dublin 18, Ireland

@: dataprotectionofficer@eurofound.europa.eu

Tel: (+353 1) 204 3100 Fax: (+353 1) 282 64 56

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