



**European Research Council**  
Executive Agency

Established by the European Commission

## RECORD OF PERSONAL DATA PROCESSING

Art. 31 of the 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 "Data Protection Regulation")

Record n°

DPO 32-2020

In accordance with Article 31 of the data protection regulation, individuals whose personal data are processed by the Executive Agency in any context whatsoever are to be protected with regard to the processing of personal data and the Executive Agency has to keep records of their processing operations.

This record covers two aspects:

1. Mandatory records under Art 31 of the data protection 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.
- Migration from notification to record

### Blue Book Trainees

<b>1</b>	<b>Last update of this record if applicable</b>	Selection and recruitment of Seconded National Experts, trainees and interimaire: DPO 43-2012
<b>2</b>	<b>Short description of the processing</b>	<p>The European Research Council Executive Agency (ERCEA) offers a five-month in-service training for a limited number of university graduates as part of the European Commission's Blue Book Traineeship scheme. The ERCEA services that are allocated a trainee select suitable candidates from the Virtual Blue Book (VBB), the database of pre-selected Blue Book candidates managed by the Traineeships Office of the Directorate-General for Education, Youth, Culture and Sport.</p> <p>Once selected, and following a possible negotiation phase with Directorates General, AMCs or other agencies interested in the same candidate(s), the ERCEA</p>

	<p>communicates the final list of trainees to the Traineeships Office. The Traineeships Office proceeds with the necessary steps to ensure the entry into service and welcome of the trainees.</p> <p>The ERCEA is in charge of the everyday management of recruited trainees, while the Traineeships Office provides for the administrative assistance (including financial management). For instance, the HR Unit creates the career in SYSPER, the Head of Unit approves leave requests and the Unit secretariat encodes absences in SYSPER. Any relevant information concerning trainees (e.g., early end of the traineeship) is also communicated to the Traineeships Office.</p> <p>At the end of the traineeship, the trainee adviser of the Blue Book Trainee draws up an in-service training report, which is sent to the Traineeships Office.</p>
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### Part 1 - Article 31 Record

<b>3</b>	<b>Function and contact details of the controller</b>	Head of Human Resources Unit (ERCEA.D.2)  <a href="mailto:ERC-SELECTION@ec.europa.eu">ERC-SELECTION@ec.europa.eu</a>
<b>4</b>	<b>Contact details of the Data Protection Officer (DPO)</b>	<a href="mailto:ERC-DATA-PROTECTION@ec.europa.eu">ERC-DATA-PROTECTION@ec.europa.eu</a>
<b>5</b>	<b>Name and contact details of joint controller (where applicable)</b>	N/A
<b>6</b>	<b>Name and contact details of processor (where applicable)</b>	Directorate-General for Informatics (DG DIGIT)  <a href="mailto:DIGIT-SYSPER2@ec.europa.eu">DIGIT-SYSPER2@ec.europa.eu</a>  Directorate-General for Education, Youth, Culture and Sport (DG EAC)  <a href="mailto:eac-stages@ec.europa.eu">eac-stages@ec.europa.eu</a>
<b>7</b>	<b>Purpose of the processing</b>	<p>The ERCEA processes personal data in order to evaluate the expertise and the suitability of pre-selected candidates in the VBB. Upon recruitment, the purpose of the processing operation is the everyday management of the traineeship.</p> <p>The Controller may envisage anonymous statistical analyses with the purpose of improving the quality of the processes and the management of human resources.</p>
<b>8</b>	<b>Description of the categories of data subjects</b>	Whose personal data are being processed?  <input type="checkbox"/> EA staff  <input type="checkbox"/> Visitors to the EA  <input type="checkbox"/> Contractors providing goods or services  <input checked="" type="checkbox"/> <b>Applicants</b>

		<p>[Pre-selected Blue Book Traineeship applicants].</p> <p><input checked="" type="checkbox"/> <b>Relatives of the data subject</b></p> <p>[Emergency contact persons].</p> <p><input type="checkbox"/> Complainants, correspondents and enquirers</p> <p><input type="checkbox"/> Witnesses</p> <p><input type="checkbox"/> Beneficiaries</p> <p><input type="checkbox"/> External experts</p> <p><input checked="" type="checkbox"/> <b>Other, please specify:</b></p> <p>[Blue Book Trainees].</p>
9	<p><b>Description of personal data categories</b></p> <p>Indicate <b>all</b> the categories of personal data processed and specify which personal data are being processed for each category (between brackets under/next to each category):</p>	<p><b>Categories of personal data:</b></p> <p><input checked="" type="checkbox"/> <b>in the form of personal identification numbers</b></p> <p>[Blue Book candidate number].</p> <p><input checked="" type="checkbox"/> <b>concerning the physical characteristics of persons as well as the image, voice or fingerprints</b></p> <p>[CVs may contain a photograph].</p> <p><input checked="" type="checkbox"/> <b>concerning the data subject's private sphere</b></p> <p>[Date and place of birth, gender, nationality].</p> <p><input type="checkbox"/> concerning pay, allowances and bank accounts</p> <p><input checked="" type="checkbox"/> <b>concerning the data subject's family and contact person</b></p> <p>[Contact details of the person to be contacted in the event of an emergency (e.g. name, surname, phone number, address), marital (civil) status].</p> <p><input checked="" type="checkbox"/> <b>concerning the data subject's career, recruitment and contracts</b></p> <p>[CV, education, training, professional experience, language knowledge, publications, hard and soft skills, preferred department for the traineeship, motivation, traineeship period].</p> <p><input checked="" type="checkbox"/> <b>concerning leave and absences</b></p> <p>[Annual or sickness leave].</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"/> <b>concerning telephone numbers and communications</b></p>

		<p>[Private phone number].</p> <p><input checked="" type="checkbox"/> <b>concerning names and addresses (including email addresses)</b></p> <p>[First name, middle name, surname, private e-mail address, private address].</p> <p><input type="checkbox"/> Other: please specify:</p> <p><b><i>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 checked="" type="checkbox"/> <b>data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct)</b></p> <p>[In-service training report following the traineeship period].</p> <p><b><i>Categories of personal data whose processing is <u>prohibited, with exceptions (art. 10 new Regulation)</u>:</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 checked="" type="checkbox"/> <b>concerning health</b></p> <p>[The ERCEA does not process any medical data of BBTs, but administrative data related to health (i.e. medical certificates)].</p> <p>[Information about any physical constraint requiring special measures to carry out the work].</p> <p><input checked="" type="checkbox"/> <b>genetic data, biometric data for the purpose of uniquely identifying a natural person</b></p> <p>[Hand-written signatures on confidentiality declarations and leaving forms].</p> <p><input type="checkbox"/> concerning sex life or sexual orientation</p> <p><b><i>Specify any additional data or explanatory information on the data being processed, if any:</i></b></p> <p><u>Data subjects may spontaneously reveal further types of personal not enumerated above.</u></p> <p><u>Note: In case of force majeure situations, the ERCEA may in these exceptional circumstances process additional personal data about health, as may be necessary to ensure the safety and well-being of our staff. Please refer to the DPN on Business Continuity for further information.</u></p>
10	<b>Retention time (time limit for keeping the personal data)</b>	The retention periods for the personal data processed by the Traineeships Office of the European Commission are

		<p>the following, as laid down in the specific privacy statement for the traineeship:</p> <ul style="list-style-type: none"> <li>- Data from non-valid applications are deleted after the application submission deadline.</li> <li>- Pre-selected and non-preselected candidates: personal data are retained for 2 years.</li> <li>- Selected candidates: certain documents (such as the application form, diplomas, traineeship offer) are kept for 5 years after the end of the traineeship.</li> </ul> <p>Statements of insurance history containing information such as first name, last name, middle name(s), date of birth, traineeship period, DG/service and amount of the grant received are retained for 50 years after the traineeship.</p> <p>Personal data shared with other EC services are stored in their IT-tools for the duration established by the Financial Regulation and the Common Retention List.</p> <p>Spontaneous applications submitted to the dedicated FMB are retained for 1 year.</p> <p>Confidentiality declarations as well as leaving forms are kept for up to 5 years.</p> <p>Medical certificates are deleted immediately at the end of the traineeship period.</p> <p>Is any further processing for archiving purposes in the public interest, historical, statistical or scientific purposes envisaged?  <input checked="" type="checkbox"/> yes <input type="checkbox"/> no</p> <p>The ERCEA may envisage anonymous statistical analyses with the purpose to improve the quality of the processes and the management of human resources. However, the retention periods mentioned above will not be increased.</p>
11	Recipients of the data	<p>The persons with access to your personal data, on a <b>need-to-know basis</b>, are:</p> <ul style="list-style-type: none"> <li>- The members of the HR Unit and authorised personnel dealing with the selection and everyday management of the Blue Book trainees;</li> <li>- The AHCC (Authority Empowered to Conclude Contracts of Employment), i.e., the ERCEA's Director;</li> <li>- Services of the European Commission: DG EAC Traineeships Office.</li> </ul> <p>In addition, certain administrative details may be disclosed, in compliance with the relevant current legislation and established case law, and on a temporary basis to legislative or supervisory bodies of the ERCEA, as well as auditing bodies or courts.</p>

12	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	N/A
13	<b>General description of the technical and organisational security measures</b>	<p>The HR Unit is responsible for the management of any documents produced, circulated and/or received, ensuring the appropriate treatment of all documents.</p> <p>E-mails including personal data should be sent via encrypted e-mail (SECEM). Access to files is limited to authorised personnel, regardless of where they are saved: on the ERCEA Shared Drive; the Functional Mailboxes (FMBs) <a href="mailto:ERC-SELECTION@ec.europa.eu">ERC-SELECTION@ec.europa.eu</a> or <a href="mailto:ERC-SPONTANEOUS-APPLICATIONS@ec.europa.eu">ERC-SPONTANEOUS-APPLICATIONS@ec.europa.eu</a>; or of which a physical copy is kept.</p> <p>The official register of the Agency is ARES/NomCom and all files therein are processed using the restricted marking. SYSPER is the HR Information System of the European Commission, access to personal data is protected by the management of the access rights, which are strictly limited to authorised personnel.</p>
14	<b>Information to data subjects/Data Protection Notice (DPN)</b>	<p>The DPN is published on the ERCEA intranet "<i>Human Resources - Data Protection &amp; Privacy</i>" - <i>Selection &amp; Recruitment Privacy Statements</i>:</p> <p><a href="http://intranet.ercea.cec.eu.int/services/human-resources/priv/Pages/Recruitment.aspx">http://intranet.ercea.cec.eu.int/services/human-resources/priv/Pages/Recruitment.aspx</a>.</p> <p>The DPN is also publicly available under the section of "Careers" on the ERC website:</p> <p><a href="https://erc.europa.eu/about-erc/careers">https://erc.europa.eu/about-erc/careers</a>.</p> <p>The Data Protection Notice for Staff Selection and Spontaneous Applications is also published on the ERCEA intranet "<i>Human Resources - Data Protection &amp; Privacy</i>" - <i>Selection &amp; Recruitment Privacy Statements</i> and on the ERC website.</p> <p>The specific privacy statement for the official traineeship with the European Commission, agencies and bodies can be found here:</p> <p><a href="https://ec.europa.eu/stages/traineeship-specific-privacy-statement_en">https://ec.europa.eu/stages/traineeship-specific-privacy-statement_en</a>.</p>