



RECORD OF PERSONAL DATA PROCESSING ACTIVITY

Based on Article 31 of the Regulation (EU) No 2018/1725¹ on the protection of natural persons with regards to the processing of personal data by the Union Institutions, bodies, offices and agencies and on the free movement of such data, each responsible EISMEA data controller has to maintain a record of the processing activities under his/her responsibility.

Record No: R-2019-06-03

Initial approval by Data Controller: *see date of Ares signature*

Previous Notification (if applicable): DPO-4-2009

Update (s) (if applicable): March 2023

NAME OF THE PROCESSING ACTIVITY

Management of Blue Book Traineeship in EISMEA

IDENTIFICATION OF THE DATA CONTROLLER

European Innovation Council and SMEs Agency, Head of Unit C.02 People, Workplace and Operational Coordination Support – HR sector C.02.1.

GROUND FOR THIS RECORD

- Record of a new type of processing activity of personal data (before its implementation)
- Record of a processing activity of personal data that is already in place (ex-post)
- Change/Amendment/ Update of an already existing previous record (or previous notification to DPO)

DESCRIPTION OF THE PROCESSING ACTIVITY

The Agency offers traineeships to the so-called “Blue-Book Trainees”. Candidates for a traineeship are preselected exclusively by the European Commission’s Traineeship Office (DG Education, Youth, Sport and Culture). Applications and personal data of preselected candidates are stored in a database (Virtual Blue Book, VBB) under the responsibility of the Traineeship Office, covered by separate notifications [DPR-EC-01746.2](#) and the corresponding [privacy statement](#).

The Agency has signed with the European Commission a Service Level Agreement which governs the access to the traineeship scheme. Only candidates included in the VBB can be recruited by the Agency. The purpose of this processing activity by the Agency is to identify potential trainees for the Agency from the preselected candidates included in VBB, that permits the trainee’s adviser(s) and traineeship coordinator to select, recruit and evaluate the trainees as well as to manage their file during the traineeship in the Agency.

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 21.11.2018).

1. INFORMATION ON THE PROCESSING ACTIVITY

Management of Blue Book Traineeship

This processing activity is performed in accordance with **Regulation (EU) No 2018/1725**² on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

1.1. The Data Controller is:

The Head of Unit C.02 People, Workplace and Operational Coordination Support at the European Innovation Council and SMEs Executive Agency (EISMEA), B-1049 Brussels, and can be contacted at: EISMEA-HR-RECRUITMENT@ec.europa.eu.

In addition, the European Commission's Traineeship office is **controller** for the virtual Blue-book (VBB) (Commission's on-line tool)³ accessible to the Agency based on the Service Level Agreement with the European Commission⁴.

1.2. The following entity(ies) is/are acting as Processor(s): n/a

1.3. The legal basis for the processing based on Article 5(1) of Regulation (EU) No 2018/1725:

- (a) the 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 body⁵;
- (a2) the processing is necessary for the **management and functioning** of the Union Institutions or bodies (Recital (22) of Regulation (EU) No 2018/1725) and in particular Rules governing the official traineeships scheme of the European Commission and the Service Level Agreement between the Agency and the European Commission⁶;
- (b) the processing is necessary for **compliance with a legal obligation** to which the controller is subject;
- (c) the 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 for not mandatory personal data;
- (e) the processing is necessary in order to protect the **vital interests** of the data subject or of another natural person.

² [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 21.11.2018).

³ The VBB is covered by a separate Record of the European Commission [DPR-EC-01746.2](#) and the corresponding [privacy statement](#).

⁴ Service Legal Agreement signed with EASME of 13.2.2017 for which EISMEA is the universal and legal successor based on Commission Implementing Decision (EU) 2021/173.

⁵ Establishment Act: [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 (OJ L 50/9 of 15.2.2021).

EISMEA Act of Delegation: [Commission Decision C\(2021\)949](#) delegating powers to the European Innovation Council and SMEs Executive Agency with a view to the performance of tasks linked to the implementation of Union programmes in the field of Innovative Europe, Single Market and Interregional Innovation Investments comprising, in particular, implementation of appropriations entered in the general budget of the Union.

[Staff Regulations of Officials of the European Communities laid down by Regulation \(EEC, Euratom, ECSC\) No 259/68 of 29 February 1968](#) laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Communities and following amendments, in particular Title II for temporary agents and Title IV for contract agents, an in particular:

- Articles 12-15 of the Conditions of Employment of Other Servants of the European Communities and the Staff Regulations (for temporary agents).

- Articles 82-84 of the Conditions of Employment of Other Servants of the European Communities and the Staff Regulations (for contract agents).

Steering Committee Decision (2015) of 23 March 2015 on the Engagement and use of Temporary Agents.

Steering Committee Decision (2012) of 18 September 2012 on the Employment of Contract Agents.

⁶ Rules governing the official traineeships scheme of the European Commission (Commission Decision of 2.03.2005 - C(2005)458) and Service Level Agreement of 13/02/2017 between DG EAC, Sector "Traineeships" and EASME for which EISMEA is the universal and legal successor based on Commission Implementing Decision (EU)2021/173.

1.4. The purpose of this processing is to manage Blue Book traineeship within the Agency; to identify potential trainees for the Agency from the preselected candidates included in the VBB that permits the trainee's adviser(s) and traineeship coordinator to select, recruit and evaluate the trainees as well as to manage their file during the traineeship in the Agency.

1.5. The categories of data subjects concerned by this processing are:
(Unselected) candidates listed on the VBB, trainees and former trainees.

1.6. The following personal data are collected:

- Personal data allowing to identify and contact the candidate: surname, first name, date of birth, photo, phone number, email address, photo;
- Access to the personal data provided by the applicant in his/her VBB profile: CV and contact details;
- Special categories of personal data (Art.10 of Regulation (EU) No 2018/1725):
 - o Information about disability might be requested in order to facilitate the access of the trainee to the Agency premises and adapt the working space;
 - o Final evaluation report following the traineeship period;
 - o Medical certificates to justify the absence of the trainees are collected by the Human Resources staff in charge of the trainees and in particular by the traineeship coordinator of the Agency during the period of traineeship.
- Copy of the attestation / evaluation report of training issued to the trainee on completion of the traineeship; where appropriate, correspondence attesting early termination of the traineeship;

Personal data of applicants for a traineeship are stored in the VBB and it is under the sole responsibility of the European Commission's Traineeship Office. Only candidates included in the VBB can be recruited by the Agency. The data processing by the Agency concerns only the selection of candidates from the VBB and the management of the recruited trainees' files during their traineeship in the Agency. The above-mentioned personal data are **mandatory** for the purpose(s) outline above.

1.7. The recipients to whom of the personal data will or might be disclosed are:

- Director of the Agency;
- Authorized Agency staff in charge of trainees and administration of the Human Resources Sector;
- Authorized staff of hosting Agency team nominated as trainee's advisers; Heads of Unit / Heads of Sector, Team Leaders, supervisors;
- authorised staff of DG HR of the European Commission involved in any exchange activities, initiatives or programme (i.e. Junior Professional Programme⁷);
- Authorised staff of DG EAC of the European Commission for different information on the training (assessment of the trainee, duration of the training...)
- Authorised staff of DG HR of the European Commission (to ensure access to the Agency and Commission buildings) and authorised staff of its contractor in charge of the security of the Agency and European Commission buildings.
- Authorized staff of the Agency and European Commission IT service to provide access rights and IT profile of the trainee.
- Authorized Agency staff in charge of stages 1 and 2 of the pre-selection process of trainees for the Agency.

Also, if appropriate, access will be given to:

- the European Commission's Internal Audit Service;
- the European Ombudsman;
- the European Court of Justice;
- the Anti-Fraud Office of the European Commission (OLAF);
- the European Court of Auditors;
- the Data Protection Officer of the Agency;

⁷ Commission decision of 13.12.2022 on establishing the Junior Professionals Programme (C(2022) 9068 final.

- the members of the Legal Service of the Agency;
- the European Data Protection Supervisor.

1.8. Personal data **will not be transferred** to third countries or international organisations.

1.9. The processing of this personal data **will not include** automated decision-making (such as profiling).

1.10. The following technical and organisational security measures are in place to safeguard the processing of this personal data:

Data collection and processing are carried out with the required confidentiality for handling staff matters in the EU institutions, via password protected computers. The data are stored on central servers of the European Commission or Agency. Access rights are provided only to authorised Agency staff on a need to know basis by means of a secure Web interface using European Commission standard IT resources and telecommunications infrastructure subject to the European Commission security decision. Paper documents are kept in locked cupboards.

1.11. The personal data concerned **will be kept for a maximum period** according to the following time limits of storing data:

- For preselected candidates, who are not selected at the final stage, personal data are retained for **2 years**; after this period all personal data are deleted.
- For selected applicant for a traineeship, documents are retained for **5 years** after the end of the traineeship.
- Special categories of personal data (Art.10 of Regulation (EU) No 2018/1725) will be kept until the end of the traineeship.

1.12. Data Subjects are informed on the processing of their personal data via a **data protection notice on their rights**:

- to access their personal data held by a controller;
- to request their personal data held by a controller to be corrected;
- to obtain in some situations erasure of their personal data held by a controller, e.g. when data are held unlawfully (right to be forgotten);
- to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- **of recourse** at any time to the **EISMEA Data Protection Officer** at EISMEA-DPO@ec.europa.eu and to the **European Data Protection Supervisor** at <https://edps.europa.eu>.

Restrictions in particular for the right to information, access, modification or cancelation in accordance with Article 25 of Regulation (EU) No 2018/1725 will apply in case of pre/investigations for irregularities or anti-fraud in order not to jeopardize potential investigations.

Request from a data subject to exercise a right will be dealt within **one month**.

Any queries concerning the processing of personal data have to be addressed to the Data Controller indicated above in 1.1. at EISMEA-HR-RECRUITMENT@ec.europa.eu.
