



Eurojust record of processing activity

Record of processing personal data activity, based on Article 31 of 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

Part I –Article 31 Record (this part is publicly available)

Nr.	Item	Description
Internal and external (through the e-Recruitment tool) recruitment of Temporary Agents (TA), Contract Agents (CA) and Seconded National Experts (SNE) of all grades		
1.	Last update of this record	23/03/2020
2.	Reference number	HRU-05 (March 2020)
3.	Name and contact details of controller	hohrconfidential@eurojust.europa.eu
4.	Name and contact details of DPO	dpo@eurojust.europa.eu
5.	Name and contact details of joint controller	
6.	Name and contact details of processor	recruitment@eurojust.europa.eu Hudson (for senior & middle management positions only)
7.	Purpose of the processing	<p>Any personal data will be processed solely for supporting Eurojust's recruitment processes in compliance with the rules set out in the <i>Eurojust recruitment policy</i>, in <i>AD Decision 2016-44 on internal mobility</i>, the <i>College Decision 2016-6 laying down general implementing provisions on the procedure governing the engagement and use of temporary staff under Article 2(f) of the CEOS</i> and <i>College Decision 2019-11 on the general provisions for implementing Article 79(2) of the CEOS governing the conditions of employment of contract staff employed under the terms of Article 3a.</i></p> <p>The purpose of the e-Recruitment system is to support Eurojust's external recruitment process by providing a centralised recruitment management system that is secure, user friendly and maintainable. It improves the efficiency of recruitment procedures by automating some elements of the process and reducing the use</p>

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		<p>of paper documents.</p> <p>The e-Recruitment system also provides a more sophisticated tool for applicants to create and submit applications and follow-up on the status of their applications. The tool does not support internal mobility procedures that are carried out outside the tool.</p>
8.	<p>Description of categories of persons whose data are processed and list of data categories</p>	<p>Data subjects are applicants to Eurojust internal and external selection procedures (TA, CA and SNE). Data subjects are also selection board members appointed by the AD.</p> <p>Data processed include data produced to facilitate the selection process namely: decisions of the AD appointing members of selection boards, screening grids for the candidates, panel member notes during the interview process, written tests, interview evaluation forms, scores obtained in steps of the procedure and minutes of selection procedures.</p> <p>In addition:</p> <p>For external recruitment procedures data processed are data included in the application forms in the e-Recruitment tool, including: Last name; first name; gender, date of birth; nationality; address; contact details; professional experience; education, motivation and professional references. In addition, applicants to external recruitment procedures submit documents to prove their education and years of professional experience to ensure their eligibility for the position they are applying for.</p> <p>For internal mobility procedures data processed are data included in the expression of interest form including: Last name; first name; job title and grade, current unit/desk; staff under direct supervision, total number of years of professional experience and start date in current grade and position current contract to determine eligibility for applying to the procedure. In addition, the form contains subjective data from the candidates describing their relevant experience in the key accountabilities of the position they wish to apply for and their motivation.</p> <p>For middle and senior management positions –whether internal or external- in addition to the information stated above, data processed include personal data related to the assessment centre the potential candidates have to undergo (assessment centre report).</p> <p>For selection board members data include the declaration of confidentiality and absence of conflict of interest for selection board members. In the declaration of confidentiality, selection board members declare that they will hold all details, personal</p>

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		<p>data and information concerning the selection procedure in strict confidence. In the declaration of absence of conflict of interest, selection board members declare whether they are acquainted with an applicant personally or professionally, they name of the applicant concerned and whether they themselves perceive a conflict of interest to act as selection board members. Based on the subjective information from the selection board members, the AD decides their inclusion in the selection procedure.</p>
9.	<p>Time limit for keeping the data</p>	<p>In accordance with <i>AD Decision 2017-04</i>, implementing <i>AD Decision 2017-03</i> on setting-up the Eurojust historical archives and internal organisational memory, the application form/expression of interest form of the successful candidate in an internal or external recruitment procedure is included in his/hers personal file and is destroyed immediately after the staff member leaves the service as per Eurojust's retention policy.</p> <p>For external recruitment procedures, all selection procedure data are kept for a period of 2 years or for applicants that have been successfully included in a reserve list until the end date of the established reserve list if the latter expires on a later date. This time limit is necessary to allow a possible review of the decision taken in the selection procedure (complaint to the European Ombudsman, appeal with the Civil Service Tribunal).</p> <p>Additionally, budgetary data of non-recruited applicants is kept for a period of 5 years for budgetary and audit purposes.</p> <p>Access and actions logs are recorded by e-Recruitment and are kept for a period of 3 years after the log date. These are accessible by users who are assigned the 'Auditor' permissions.</p> <p>For internal mobility procedures documents are kept for a maximum period of one year after the end of the process unless there is a justified need to retain them further (e.g. ongoing litigation or pre-litigation activity).</p> <p>The staff in the Recruitment Sector are responsible to ensure the destruction of all relevant data at the end of the retention period on a yearly basis.</p> <p>For middle and senior management positions and in accordance with the Eurojust Recruitment Services contract, the contractor must keep all original documents stored on any appropriate medium, including digitised originals if authorised under national law, for a period of five years starting from the payment of the balance of the last specific contract issued.</p>

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10.	Recipients of the data	<p>HR Recruitment Sector staff have access to the expression of interest forms for internal mobility and submitted application files through e-Recruitment for external recruitment. They also have access to the outcome of the procedural steps for all selection procedures for as long as the data is held. Access to application files in e-Recruitment is read only.</p> <p>Eurojust staff members appointed to the selection board have access only to the submitted application files and outcomes for the selection procedure for which they are appointed, until the selection procedure is finalised. Access to application files in e-Recruitment is read only.</p> <p>A profile in e-Recruitment is created for the Head of HR and the Administrative Director; this profile has read only access to selection procedures that have been finalised (by establishment of a reserve list or cancellation).</p> <p>An auditor profile is created in e-Recruitment for the DPO, which gives access to the list of existing users and corresponding permissions, user accesses and navigation log, user access management log, actions on selection procedures and actions on applications. This profile may be used for audit purposes by the EDPS and/or European Court of Auditors.</p> <p>Access to the e-Recruitment system is limited to connections from the Eurojust Office Network and protected under the single sign-on system directly connected to the Eurojust user accounts. Access permissions to the system are managed individually by IM's Application Management, based on requests from the Human Resources Unit. Access permissions for Selection Board members are assigned by HR Recruitment, per selection procedure, based on the decision of the AD appointing the members. Access rights follow the e-Recruitment Access Policy.</p> <p>For application management and administration purposes, two dedicated profiles have been created for IM: one for User Support and ICT OPS Back Office and one for IM Application Management. These profiles give the necessary e-Recruitment access to manage user access profiles, update templates within the system (e.g. notifications), customise some features within the tool and import Eurojust organisational structures (e.g. Units and Sectors, without any identity information). Neither profile gives access to any applicant or application-related data.</p> <p>For middle and senior management positions only, access may be granted to an external advisor tasked to assist the selection board. The external advisor may be required to provide expert</p>

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		<p>advice to the Selection Board at each stage of the selection procedure, prepare the required documentation (e.g. screening sheet, interview evaluation sheet, correspondence with candidates, etc.) and carry out the assessment centre on behalf of Eurojust. The external advisor may also be responsible for administrative matters related to the procedure (collecting applications, correspondence with candidates, logistical arrangements) as per Eurojust's recruitment services contract.</p> <p>If a complaint is lodged with regard to an internal and external selection procedure, the data will be transferred to the Legal Affairs Unit for assessment and advice. Once the complaint is finalised, the Legal Affairs Unit will delete all records and anonymise any records that might be kept for future reference.</p>
11.	<p>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</p>	<p>No</p>
12.	<p>General description of security measures, where possible.</p>	<p>The e-Recruitment system has been developed and implemented following the general security methodology applied in all Eurojust ICT projects implemented by the IM Unit. ICT Security performed a risk assessment and security requirements were provided (see attached document). These were implemented before the system's rollout into Production.</p> <p>External recruitment procedures All external recruitment related documents (Eligibility documents, vacancy, minutes, tests etc.) are kept in a physical Recruitment file in a locked room where only members of the HR unit involved in the respective processes have access with their badge. The Security Unit of Eurojust is responsible to grant access to the room and it will do so after a written and reasoned request from the data controller.</p> <p>Internal recruitment procedures Expression of interest forms are received and stored in the applications@eurojust.europa.eu mailbox, which is accessible only to the staff in the Recruitment Sector. Expression of interest forms together with all other internal recruitment selection data are kept in individual folders in the HR SharePoint where access is restricted to HR staff involved in the respective processes. Conflict of interest forms are kept in a physical form in a locked room where only members of the HR unit involved in the respective</p>

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		processes have access with their badge.
13.	<p>For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:</p>	<p>When a potential applicant creates an account in e-Recruitment, an information notice describing which personal data are processed, by whom and for which purpose is displayed. When an applicant wishes to submit an application, he/she is requested, as the data subject, to acknowledge receipt of this notification of data processing before continuing. Applicants, as Data Subjects, are informed of their rights to access, correct, block and delete their personal data at any time.</p> <p>An information notice regarding data protection rights of potential applicants is included in the expression of interest form. Potential candidates that wish to exercise their rights can contact HR recruitment.</p> <p>In accordance with the Eurojust Recruitment Services Contract, the contractor warrants that Eurojust post holders shall be properly informed at the moment of collection of their personal data about the conditions of processing of their personal data as well as of the circumstances under which such data may be communicated to any third party. The assessment report is communicated to the candidate upon request.</p> <p>In addition, data subjects are informed through the Data Protection notice in the Eurojust public website.</p>