



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 ('the Regulation')

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

Nr.	Item	Description
Internal and external (through the eRecruitment tool – Oleeo) recruitment of Temporary Agents (TA), Contract Agents (CA), Seconded National Experts (SNE), and Trainees.		
1.	Last update of this record	October 2025
2.	Reference number [For tracking, please contact the DP Office for obtaining a reference number.]	HRU-21 (October 2025)
3.	Name and contact details of controller [Use functional mailboxes, not personal ones, as far as possible - this saves time when updating records and contributes to business continuity.]	Head of the Human Resources Unit hohrconfidential@eurojust.europa.eu
4.	Name and contact details of DPO	dpo@eurojust.europa.eu
5.	Name and contact details of joint controller (where applicable) [If you are jointly responsible with another EUI or another organisation, please indicate so here (e.g. two EUIs with shared medical service). If this is the case, make sure to mention in the description who is in charge of what and whom people can address for their queries.]	N/A
6.	1/ Name and contact details of processor (where applicable) [If you use a processor (contractor)]	Staff in the HR Recruitment & Development Sector of the Human Resources Unit

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	to process personal data on your behalf, please indicate so (e.g. 360° evaluations, outsourced IT services or pre-employment medical checks).] 2/ Persons processing under the authority of the controller according to Article 30 of Regulation (EU) 2018/1725 (“internal processors”).	(recruitment@eurojust.europa.eu) Price Waterhouse Coopers (PWC), Hudson and ODRL (until 13/12/2026) – framework contract currently in place. Hudson, Mercer and PWC (from 14/12/2026 to 13/11/2028) – for senior & middle management positions only – new framework contract from end of 2026. The software supplier for external recruitments (Oleeo) may process applicants’ personal data, when requested by Eurojust’s HR Recruitment and Development Sector or Information Management Unit staff, for troubleshooting purposes regarding applicant accounts – data categories: first name, last name and email address.
7.	Purpose of the processing [Very concise description of what you intend to achieve; if you do this on a specific legal basis, mention it as well (e.g. Staff Regulations for selection procedures).]	Personal data will be processed solely for the purpose of supporting Eurojust’s recruitment processes in compliance with the rules set out in the Eurojust Recruitment Policy, in AD Decision 2022-53 on Internal Mobility, the 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, 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, and College Decision 2021-11 laying down rules on the secondment of national experts to Eurojust. The purpose of the eRecruitment 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 of paper documents. The eRecruitment 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, which are carried out outside the tool. The recruitment process at Eurojust is explained in the Eurojust Applicant Guidelines.
8.	Description of categories of persons whose data are processed and list of data categories [In case data categories differ between different categories of	Data subjects are applicants to Eurojust internal (TA, CA) and external selection procedures (TA, CA, SNE, Trainee). Internal users of the eRecruitment tool are also data subjects, namely: selection board members appointed by the Administrative Director (AD) and staff members belonging to

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	persons, please explain as well. Be precise regarding the categories of data: contact details. Name, surname, email address, phone number, etc.]	the HR Recruitment and Development Sector. Data categories processed in the scope of recruitment procedures 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. Specifically, for: External recruitment procedures – data categories processed are data included in the application forms in the eRecruitment tool, including: Last name, first name, gender, date of birth, nationality, address, contact details (mobile phone number and email), 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. Internal mobility procedures – data categories 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 in order 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 also their motivation. 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). For selection board members, data include the declarations of confidentiality and absence of conflict of interest. In the declaration of confidentiality, selection board members declare that they will hold all details, personal 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, the name of the applicant concerned, and whether they perceive a conflict of interest themselves 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. Finally, both for HR Recruitment staff members and selection board members data categories processed include first name, last name, and email address, to perform

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		authentication and authorisation when accessing the eRecruitment tool.
9.	Time limit for keeping the data [Indicate your retention period including its starting point; differentiate between retention periods of categories of persons or data where needed (e.g. in selection procedures: candidates who made it onto the reserve list vs. those who did not)]	In accordance with AD Decision 2017-04, implementing AD Decision 2017-03 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 their personal file and is destroyed immediately after the staff member leaves the service, as per Eurojust's retention policy. For external recruitment procedures, all selection procedure data are kept for a period of 2 years after the reserve list validity date, or after the selection procedure cancellation date, in case a reserve list is not resulting from the procedure. 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 General Court) – appeal procedures are detailed in the Eurojust Applicant Guidelines. Additionally, budgetary data of non-recruited applicants is kept for a period of 5 years for budgetary and audit purposes. Access and actions logs are recorded by eRecruitment and are kept for a period of 18 months after the log date. These are accessible by users with the 'Auditor' permissions. 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). The staff in the HR Recruitment & Development Sector are responsible for ensuring the destruction of all relevant data at the end of the retention period, on a yearly basis. 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 digitalised 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.
10.	Recipients of the data [Who will have access to the data within Eurojust? Who outside Eurojust will have access? Note: no need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS)]	HR Recruitment and Development Sector staff have access to the expression of interest forms, for internal mobility, and submitted application forms through eRecruitment, 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 eRecruitment is read only. Eurojust staff members appointed to the selection board

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		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 eRecruitment is read only. An auditor profile is created in eRecruitment, to be assigned to the relevant people when necessary. This profile 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. It may be used for audit purposes by the DPO, EDPS Internal Audit Service and/or European Court of Auditors. Access to the eRecruitment system by Eurojust post holders requires 2nd factor authentication. Access permissions to the system are managed on an individual basis by the HR Recruitment & Development Sector. Access rights follow the eRecruitment Access Policy. 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 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. 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.
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards? [E.g. processor in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty. If needed, consult DPO for more information on how to ensure	The eRecruitment system supplier (Oleeo)'s hosting data centre is located in two geographically separate facilities in the UK. As the UK has been granted an adequacy decision by the European Commission, it is considered a safe third country for data transfers. Subprocessors do not have access to data and are only used for infrastructure and authentication purposes.

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	safeguards.]	
12.	General description of security measures, where possible. [Include a general description of your security measures that you could also provide to the public.]	External recruitment procedures The eRecruitment system has been developed and implemented in accordance with the general security methodology applied in all Eurojust ICT Projects implemented by the IM Unit. ICT Security produced a System Security Risk Assessment (SSRA), identifying a number of security requirements. A Security Implementation Report (SIR) detailing the implemented measures was produced for the purpose of protecting against these risks. These measures ensure that eRecruitment remains a trusted system for safeguarding personal data, while maintaining operational integrity, and were implemented before the system was released into production. HR SharePoint folders, where access is restricted to staff within the HR Recruitment and Development Sector involved in the respective processes, are used to store additional data sent by applicants during the selection procedure, which is not collected via eRecruitment (e.g. written tests, written test and interview scores, proof of professional experience, education diplomas, etc.). 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 HR Recruitment and Development 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 Recruitment and Development Sector staff involved in the respective processes. Conflict of interest forms are kept in a physical file in a locked room where only members of the HR unit involved in the respective processes have access, by using their badge.

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13.	For more information, including how to exercise the data subject's rights to access, rectification, object and data portability (where applicable), see the data protection notice: [While publishing the data protection notice is not strictly speaking part of the record, doing so increases transparency and adds no administrative burden, since it already exists.]	The eRecruitment portal includes a 'privacy statement' link which points (potential) applicants to the information notice describing which personal data are processed, by whom and for which purpose. When an applicant wishes to submit an application, they are 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. An information notice regarding data protection rights of potential applicants for internal mobility is included in the expression of interest form. Potential candidates that wish to exercise their rights can contact the HR Recruitment and Development Sector via recruitment@eurojust.europa.eu. 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. In addition, data subjects are informed through the Data Protection Notice in the Eurojust public website.