

**Record of processing activities regarding the  
selection and recruitment of trainees of the European Institute of Innovation and Technology**

Nr	Item	Description
1	Reference number	DPO-17
2	Name of the data controller, the data protection officer and processor, if applicable and contact details	<p><b>The data controller</b> is the Head of the Services and Finance Unit</p> <p>Contact e-mail: <a href="mailto:HR@eit.europa.eu">HR@eit.europa.eu</a></p> <p><b>The Data Protection Officer</b> of EIT is Nora TOSICS</p> <p>Contact e-mail: <a href="mailto:EIT-DPO@eit.europa.eu">EIT-DPO@eit.europa.eu</a></p>
3	Purposes of the processing	The purpose of processing personal data is to select and recruit trainees to meet the objectives of the EIT traineeship scheme, in particular to promote European integration by providing an opportunity for trainees to acquire practical experience of the activities of the European institutions in general and the European Institute for Innovation and Technology in particular.
4	Categories of data subjects	The data subject are the candidates who have submitted an application for a traineeship at the EIT.
5	Categories of the personal data processed	<p>The following types of personal data are processed for the above mentioned purposes in accordance with the Data Protection Regulation of the European institutions:</p> <ul style="list-style-type: none"> <li>• Personal data provided by the candidate allowing identification of the candidate (surname, first name, date and place of birth, gender, nationality);</li> <li>• Photo of the candidate is not requested, but may be included in the CV;</li> <li>• Information provided by the candidate to verify whether or not he/she meets the eligibility criteria fixed in a call for applications (such as citizenship, language certificates, diploma/training: year awarded, title, name of the awarding body, employment records)</li> </ul>

		<p>etc.);</p> <ul style="list-style-type: none"> <li>• Contact information provided by the candidate to allow the practical organisation of the selection process (street, postcode, town, country, telephone number, fax, e-mail address);</li> <li>• Information about the candidate’s motivation and preferences in terms of preferable unit or type of activity;</li> <li>• Financial information at the end of the recruitment procedure (for instance, bank account details);</li> <li>• Personal data about family only in case the candidate is a close family member of an EIT staff member or of an EIT Governing Board member;</li> <li>• Information concerning special needs (disability)</li> <li>• In case of recruitment, the selected candidate is requested to sign a conflict of interest declaration.</li> </ul> <p>The EIT does not require the applicants to submit any special category of data as part of the selection and recruitment procedure. If participants decide to share such information for example by means of attaching a photo to their CV this is done spontaneously and thereby with unambiguous consent.</p>
6	Categories of data recipients	<p><b>Within the EIT:</b></p> <p>The personal data of the candidates is processed by the EIT authorised staff: HR staff, EIT staff participating in the Committee in charge of the pre-selection of the candidates for traineeship, Heads of Units and Director of the EIT.</p> <p>Access will be given to the Internal Auditor of the EIT by request if necessary for the performance of the duties of the Internal Auditor.</p> <p><b>Within the Commission and other EU institutions/bodies/agencies:</b></p> <p>The authorized staff that may have access to relevant personal data for audit control or investigation purposes: Court of Auditors, Internal Audit Service of the European Commission, European Anti-</p>

		<p>Fraud Office (OLAF).</p> <p>For the purpose of handling review procedures, access to the personal data may be granted to the European Ombudsman, the European Data Protection Supervisor, the General Court and the European Court of Justice upon request and to the extent necessary for handling the review procedure.</p> <p><b>Third parties subject to the GDPR<sup>1</sup> and third parties not subject to the GDPR:</b></p> <p>Exceptionally and if necessary, information concerning the trainee selection and recruitment may be disclosed to external lawyers (advocates) subject to the GDPR for specific and limited purposes only. In this case a written contract (service contract) is signed between the EIT and the external lawyer in order to ensure that that Article 29 of the Data Protection Regulation of the EU institutions is respected by the data processor. These written contracts follow the model of the Commission and include a specific article on data protection.</p> <p>The same applies to external IT contractors with whom the EIT has a framework contract in order to provide IT services for the EIT.</p>
7	Time limit storage	<ul style="list-style-type: none"> <li>• <u>Data of recruited candidates</u>: the personal data of the trainee is stored in the personnel file throughout the employment at the EIT. The personnel files will be retained for a period of <b>7 years</b> after the traineeship budget is discharged in accordance with the Financial Regulation. Once the above mentioned period of 7 years is completed, only the data necessary for providing a copy of the trainee certificate (name of the trainee, information on the duration of the traineeship, the unit to which the trainee was assigned, the name of supervisor and the nature of work performed) is stored for 50 years. Following the expiry of the 7 years, any further data required for historical, statistical or scientific purposes should be kept in an anonymous form.</li> <li>• <u>Data of shortlisted but not recruited candidates</u> is kept for a period of <b>2 years</b> from the expiry of the validity of the shortlist for the purposes of potential review procedures</li> </ul>

<sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

		<p>concerning the selection and recruitment procedure (complaint to the EIT, complaint to the European Ombudsman, appeal to the General Court, etc.) and for budgetary or audit purposes. In case the length of the review procedure exceeds the period of two years, the relevant data are kept for the duration of the ongoing review procedure.</p> <ul style="list-style-type: none"> <li>• <u>Data of non-shortlisted candidates</u> is kept for a period of 2 years from the establishment of the shortlist in which they are not included, for the purposes of potential review procedures concerning the selection and recruitment procedure (complaint to the EIT, complaint to the European Ombudsman, appeal to the General Court, etc.) and for budgetary or audit purposes. In case the length of the review procedure exceeds the period of 2 years, the relevant data are kept for the duration of the ongoing review procedure.</li> </ul>
8	If applicable, transfers of personal data to a third country or to international organization (if yes, the identification of that third country or international organization and the documentation of suitable safeguards)	No
9	For more information, including how to exercise rights to access, rectification, object and data portability (where applicable), see the data protection notice:	<p>Please consult the Data Protection page on the EIT's website:</p> <p><a href="https://eit.europa.eu/who-we-are/legal-framework/data-protection">https://eit.europa.eu/who-we-are/legal-framework/data-protection</a></p> <p>or consult the Traineeship Scheme on the following page:</p> <p><a href="https://eit.europa.eu/work-with-us/careers">https://eit.europa.eu/work-with-us/careers</a></p>

Signature of the data controller

(Approval is given via a workflow in ARES in place of a handwritten signature)

