



## European Ombudsman

### Secretary General

Personnel, Administration and Budget Unit

### European Ombudsman

#### Public record of processing activity<sup>1</sup>:

#### Recruitment procedure for trainees in the EO Office

**1. Last update of this record:** 21.07.20

**2. Reference number<sup>2</sup>:** 13/2020

**3. Name and contact details of the controller<sup>3</sup>:** European Ombudsman (EO), 1 avenue du Président Robert Schuman, CS 30403, F-67001 Strasbourg Cedex.

Contact: Personnel, Administration and Budget Unit (PAB) - HR Sector - [EOtraineeship@ombudsman.europa.eu](mailto:EOtraineeship@ombudsman.europa.eu)

Responsible department: Personnel, Administration and Budget (PAB) Unit- HR Sector.

**4. Name and contact details of the Data Protection Officer:** Mr Juliano Franco, [Dpo-Euro-Ombudsman@ombudsman.europa.eu](mailto:Dpo-Euro-Ombudsman@ombudsman.europa.eu)

**5. Name and contact details of the processor<sup>4</sup>:**

**6. Name and contact details of the joint controller(s)<sup>5</sup>:** European Commission (1) Pay Master Office (PMO) which is the system owner of the on-line application "MIPS", used by the EO trainees to introduce their missions and authorised travels and obtain the reimbursement and (2) DG DIGIT which manages the SYSPER IT tool, used by the EO to create the profile of the recruited trainees and manage their rights (security badge, ICT rights, time management)-email: [DIGIT-SYSPER2@ec.europa.eu](mailto:DIGIT-SYSPER2@ec.europa.eu).

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<sup>1</sup> To be filled in by the controller. See Article 31(1) and (5) on records of processing activities of Regulation 2018/1725: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

<sup>2</sup> For tracking. If the office decides to keep a central register, contact the keeper of that register to obtain a reference number.

<sup>3</sup> Use functional mailboxes as far as possible to ensure business continuity.

<sup>4</sup> Where applicable. If you use a processor (contractor) to process personal data on your behalf, please indicate so (e.g. 360° evaluations, outsourced IT services or pre-employment medical checks).

<sup>5</sup> Where applicable. If you are jointly responsible with another EU institution, please indicate so here (e.g. two institutions with shared medical service). If this is the case, make sure to mention in the description who is in charge of what and who people can address for their queries.



**7. Purpose(s) of the processing<sup>6</sup>:** to recruit trainees in compliance with the traineeship notice published each year and the [Decision of the European Ombudsman concerning traineeships of 28.01.2020](#). The processing of the trainees' personal data is necessary to verify the information they declare in their applications, to establish their financial and other rights (e.g. family allowances) and to issue their badges.

**8. Description of the categories of data subjects and of the categories of personal data<sup>7</sup>:**

- Categories of data subjects: trainees to be recruited in the EO Office.

- Categories of personal data:

- data included in the application form processed on Recruteo (IT tool used by the EO for the selection procedure): name, surname, date of birth, city of residence, telephone number, e-mail, languages, studies/diplomas, professional experience;
- ID card or passport;
- place of birth, country of birth, nationality at birth, second nationality; marital status and family situation;
- Legal entity and financial identification forms (including their bank account details for receiving their monthly grant);
- form for requesting the reimbursement of travel costs<sup>8</sup>: place of recruitment; place of assignment (Strasbourg or Brussels);
- data concerning third parties (e.g. spouse or children of the recruited trainees), if applicable, for calculating the relevant allowances and the need to insure the spouse and children against the risk of sickness and accident<sup>9</sup>;
- form on declaration of conflict of interest;
- declaration of confidentiality;
- traineeship certificate, issued by the traineeships officer at the end of the traineeships.

**9. Time limit for keeping the data and, where possible, for erasure<sup>10</sup>:**

Data concerning the recruited trainees are kept for two years after the end of the traineeship, in paper and electronic versions, except the data relating to the reimbursement of travel costs, which are kept for seven years. Data necessary to

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<sup>6</sup> 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).

<sup>7</sup> In case data categories differ between different categories of persons, please explain as well (e.g.: suspects vs. witnesses in administrative inquiries)

<sup>8</sup> According to the Decision of the European Ombudsman concerning traineeships of 28.01.2020, recruited trainees are entitled to the reimbursement of travel costs within the territory of the European Union and accession countries, between their place of residence and Strasbourg/Brussels, at the beginning and end of the traineeship.

<sup>9</sup> According to the Decision of the European Ombudsman concerning traineeships of 28.01.2020, at the request of the recruited trainee, the EO will also insure his/her spouse and children against the risk of sickness and accident.

<sup>10</sup> Indicate your administrative retention period including its starting point; differentiate between 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).



issue a traineeship certificate (name, surname, dates of traineeship, unit and tasks exercised) are kept for 15 years. Data is deleted afterwards.

If a trainee with a disability is recruited, and in case the Office makes appropriations available to cover additional costs related directly to his/her condition<sup>11</sup>, the medical certificates attesting the disability are kept seven years. They are deleted afterwards.

**10. Recipients of the data**<sup>12</sup>: The EO, the Secretary General (SG), the traineeships officer, the Head of PAB Unit, the Head of HR sector, the Head of Unit in which the recruited trainee is assigned and the staff member(s) in finances sector dealing with payments (e.g. monthly grants, reimbursement of missions and travel costs).

**11. Are there any transfers of personal data to third countries and/or to International Organisations?**<sup>13</sup>: N/A

**12. General description of security measures**<sup>14</sup>:

Data collected and stored in electronic version in relation to the recruitment procedure of trainees is only accessible to those EO staff members involved in the relevant recruitment, on a need to know basis, on the EO servers. Documents in paper version are kept in locked cupboards in the office of the traineeships officer. Data introduced in SYSPER is kept according to the security measures developed by DG DIGIT which owns and manages it.

**13. Information on how data subjects can exercise their rights of access and rectification, and where applicable, of erasure, restriction and data portability**<sup>15</sup>:

The recruited trainees can access and rectify their own data in Sysper. They can also ask to have access to their own personal data and to relevant information concerning how the EO uses it. They can also request rectification of any incomplete or inaccurate data concerning them. They can rectify identification data at any time during the procedure. They have a right to object to the use of their data by the EO on grounds relating to their particular situation, at any time. Under certain conditions, they have the right to ask that the EO deletes their personal data or restrict its use.

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<sup>11</sup> See Article 8 of the Decision of the European Ombudsman concerning traineeships of 28.01.2020: Financial arrangements- Monthly grants “*If an applicant with a disability is selected, as part of reasonable accommodation, the Office will make appropriations available to cover additional costs related directly to the condition of the selected trainee and which are insufficiently covered by the monthly grant*”.

<sup>12</sup> Who will have access to the data within the European Ombudsman? Anyone outside the office? No need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EDPS, Court of Auditors).

<sup>13</sup> If yes, include the identification of the country or International Organisation and the documentation of suitable safeguards (e.g. processor in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty).

<sup>14</sup> Where possible. Include a general description of your security measures that you could also provide to the public. See Article 33 on security of processing of Regulation 2018/1725: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

<sup>15</sup> Consider publishing the relevant part of the privacy statement and providing a link. See Articles 15 and 16 on the information to be provided to the data subject(s) and Article 17 to 22 on the rights of data subjects of Regulation 2018/1725: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>



At any time, they may ask the EO information concerning its processing of their personal data by e-mail ([EOtraineeship@ombudsman.europa.eu](mailto:EOtraineeship@ombudsman.europa.eu)) or by contacting PAB Unit members-HR sector. The Head of PAB Unit will reply to their requests as soon as possible and within one month at the latest. They may also contact the EO Data Protection Officer at : [dpo-eo-ombudsman@ombudsman.europa.eu](mailto:dpo-eo-ombudsman@ombudsman.europa.eu) If they wish to complain about the Ombudsman's handling of their personal data, they may contact the European Data Protection Supervisor ([www.edps.europa.eu](http://www.edps.europa.eu)) at the following address: [EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)



# Privacy statement

## relating to the recruitment of trainees within the European Ombudsman's Office

This privacy statement explains the reason for the processing, the way the European Ombudsman (EO) collects, handles and ensures protection of all personal data provided, how that information is used and what rights the data subjects may exercise in relation to their data.

The controller is the EO. The joint controller is the European Commission -(i) Directorate-General DIGIT (for the use of SYSPER) and (ii) the Paymaster Office (PMO) which is the system owner of the on-line application "MIPS", used by the EO trainees to introduce their missions and authorised travels and obtain the reimbursement.

### 1. What personal data will the European Ombudsman process?

We process the following data of the trainees to be recruited in the EO Office;

- data included in the application form processed on Recruteo (IT tool used by the EO for the selection procedure): name, surname, date of birth, city of residence, telephone number, e-mail, languages, studies/diplomas, professional experience;
- ID card or passport;
- place of birth, country of birth, nationality at birth, second nationality; marital status and family situation;
- Legal entity and financial identification forms;
- form for requesting the reimbursement of travel costs<sup>16</sup>: place of recruitment; place of assignment (Strasbourg or Brussels);
- data concerning third parties (ex: spouse or children of the recruited trainees), if applicable, for calculating the relevant allowances and the need to insure the spouse and children against the risk of sickness and accident<sup>17</sup>;
- form on declaration of conflict of interest;
- confidentiality statement;

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<sup>16</sup> According to the Decision of the European Ombudsman concerning traineeships of 28.01.2020, recruited trainees are entitled to the reimbursement of travel costs within the territory of the European Union and accession countries, between their place of residence and Strasbourg/Brussels, at the beginning and end of the traineeship.

<sup>17</sup> According to the Decision of the European Ombudsman concerning traineeships of 28.01.2020, at the request of the recruited trainee, the EO will also insure his/her spouse and children against the risk of sickness and accident.



- traineeship certificate issued by the traineeships officer at the end of the traineeships.

## 2. Why does the European Ombudsman process these personal data?

The purpose is to recruit trainees in compliance with the traineeship notice issued each year and the [Decision of the European Ombudsman concerning traineeships of 28.01.2020](#). The processing of personal data aims at verifying the recruited trainees' identity, establishing their financial rights and issuing the badges.

## 3. What are the legal bases and necessity for processing this data?

Processing is necessary on the basis of Article 5(1)(a) (the performance of a task carried out in the public interest) of Regulation 2018/1725.

The legal basis is the [Decision of the European Ombudsman concerning traineeships of 28.01.2020](#).

## 4. Who is responsible for processing the data?

Data is processed by the Unit Personnel, Administration and Budget (PAB)- Sector Human Resources (HR) and Sector Finances.

## 5. Who will be recipients of the data?

The EO, the Secretary General (SG), the Traineeships Officer, the Head of PAB Unit, the Head of HR sector, the Head of Unit in which the recruited trainee is assigned and the staff member(s) in Finances sector dealing with payments to trainees (monthly grants, reimbursement of missions and travel costs).

## 6. How long will the data be kept?

Data concerning the recruited trainees are kept for two years after the end of the traineeship, in paper and electronic versions, except the data relating to the reimbursement of travel costs, which are kept for seven years. Data is deleted afterwards, except data necessary to issue a traineeship certificate (name, surname, dates of traineeship, unit and tasks exercised) which are kept for 15 years.

If a trainee with a disability is recruited, and in case the Office makes appropriations available to cover additional costs related directly to his/her condition, the medical certificates attesting the disability are kept seven years for audit purposes. They are deleted afterwards.



## 7. How do we protect your data?

Data collected and stored in electronic version in relation to the recruitment procedure of trainees is only accessible to those EO staff members involved in the relevant recruitment, on a need to know basis, on the EO servers. Documents in paper version are kept in locked cupboards in the office of the traineeships officer. Data introduced in SYSPER is kept according to the security measures developed by DG DIGIT which owns and manages SYSPER.

## 8. What are your rights and how can you exercise them?

You have the right of access to your own personal data and to relevant information concerning how the EO uses it. You can access and rectify your own data in Sysper.

You have also a right to request rectification of any incomplete or inaccurate data concerning you. You can rectify identification data at any time during the procedure. You have a right to object to the use of your data by the EO on grounds relating to your particular situation, at any time. Under certain conditions, you have the right to ask that the EO deletes your personal data or restrict its use.

The EO will reply to your requests as soon as possible and within one month at the latest.

## 9. Who to contact in case of queries or complaints concerning data protection issues?

At any time, the recruited trainees may send data protection related questions concerning the recruitment procedure to the European Ombudsman, at the following address:

European Ombudsman  
1 avenue du Président Robert Schuman  
CS 30403  
F-67001 Strasbourg Cedex  
[EOtraineeship@ombudsman.europa.eu](mailto:EOtraineeship@ombudsman.europa.eu)

They also may contact the Data Protection Officer of the European Ombudsman at the following address: [DPO-Euro-Ombudsman@ombudsman.europa.eu](mailto:DPO-Euro-Ombudsman@ombudsman.europa.eu)

They have the right to lodge a complaint to the European Data Protection Supervisor ([https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en](https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en)) if they consider that their rights under Regulation 2018/1725 have been infringed as a result of the processing of their personal data.