



Secretary General

Personnel, Administration and Budget Unit

European Ombudsman

Public record of processing activity:¹

Internal selection procedures within the European Ombudsman's Office

1. Last update of this record: 19.05.21

2. Reference number:² 6/2021

3. Name and contact details of the controller:³ European Ombudsman, 1 avenue du Président Robert Schuman, CS 30403, F-67001 Strasbourg Cedex - Contact: Directorate for administration- HR team - career@ombudsman.europa.eu

4. Name and contact details of the Data Protection Officer: Ms Francesca PAVESI- Deputy DPO: Mr Nicholas HERNANZ- Dpo-Euro-Ombudsman@ombudsman.europa.eu

5. Name and contact details of the processor:⁴ N/A

6. Name and contact details of the joint controller(s):⁵ N/A

7. Purpose(s) of the processing:⁶ To identify internal candidates for filling vacancies in the EO Office and to carry out the relevant internal selection procedure.

The legal basis of the internal selection procedures are the Staff Regulations (particularly Article 29.1 d SR⁷), the Conditions of Employment of Other Servants of

¹ 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>

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

³ Use functional mailboxes as far as possible to ensure business continuity.

⁴ 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).

⁵ 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.

⁶ 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).

⁷ See Article 29.1 d SR: "Before filling a vacant post in an institution, the appointing authority shall first consider: (...) (d) whether to hold a competition internal to the institution, which shall be open only to officials and temporary staff as defined in Article 2 of the Conditions of Employment of Other Servants of the European Union; (...)".



the EU, and the [Decision of the European Ombudsman on promotion of officials and reclassification of temporary and contract agents](#).

8. Description of the categories of data subjects and of the categories of personal data:⁸

- Categories of data subjects: EO staff members applying to internal vacancy notices/calls for expression of interest for permanent, temporary or contract posts in the EO Office through the functional mailbox “career” (career@ombudsman.europa.eu)

- Categories of personal data:

1) Data provided by the candidates:

- identification data (first name, last name);
- information contained in the CV (education, work experience, language proficiency, nationality, email address, etc.);
- if necessary, a statement sent by email declaring any disability to ensure that the necessary accessibility measures can be put in place;
- information contained within any motivation letter;
- copies of the candidates’ diplomas, staff reports, and evidence of professional experience, if required,
- replies of the candidates to the case studies, if applicable.

2) Data processed by the staff members of the HR team responsible for the selection procedures, such as:

- the decisions appointing the Advisory Selection Committee;
- the eligibility notes approved by the Advisory Selection Committee and the EO;
- the candidates’ evaluation grids;
- the pre-selection notes submitted to the EO.

The staff members of the HR team also process the requests for review/information submitted by the candidates by email and the relevant replies. These documents are stored in the functional mailbox “Career”.

9. Time limit for keeping the data and, where possible, for erasure:⁹

Data of unsuccessful candidates is deleted from the electronic folder in the EO server and from the functional mailbox “Career” two years after the end of the relevant internal selection procedure. Documents in paper on unsuccessful candidates (e.g. applications, supporting documents) are also destroyed two years after the end of the relevant internal selection procedure.

⁸ In case data categories differ between different categories of persons, please explain as well (e.g.: suspects vs. witnesses in administrative inquiries)

⁹ 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).



Data of recruited candidates is kept for a period of 10 years after the termination of employment, or the last pension payment, after which time it is destroyed.

10. Recipients of the data:¹⁰ The EO, the Secretary General (SG), the Director of Inquiries, the Director for Administration, the HR team staff members responsible for the internal selection procedures, and the members of the Advisory Selection Committee.

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

12. General description of security measures¹²:

Electronic data is stored on the Ombudsman's servers (shared folder). Data is protected by numerous security measures set up by the Information and Communication Technologies (ICT) staff to protect the integrity and confidentiality of the Institution's electronic property. The staff member(s) of the HR team responsible for internal selection procedures keep documents in paper related to the selection procedures (e.g. applications, supporting documents) in locked cupboards in their office(s).

Access to personal data is protected through the management of access rights, which are strictly limited, under the 'need to know' principle, by the user's remit. Only the Director for Administration, the Head of the HR team and the staff members of the HR team responsible for internal selection procedures have access to it.

13. Information on how data subjects can exercise their rights of access and rectification, and where applicable, of erasure, restriction and data portability¹³:

Candidates have the right of access to their own personal data and to relevant information concerning how the EO uses it. They have also the right to request rectification of any incomplete or inaccurate data concerning them, if the confidentiality of the deliberations and decision-making of the Advisory Selection Committee is safeguarded, along with the rights of other candidates. Candidates can rectify identification data at any time during the procedure. Concerning data related to admissibility or assessment, the right of rectification can be exercised up until the closing date for the submission of applications. Data subjects have a right to object to the use of their data by the EO on grounds relating to their particular

¹⁰ 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).

¹¹ 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).

¹² 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>

¹³ 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>



situation, at any time. Under certain conditions, they have the right to ask that the office delete their personal data or restrict its use.

At any time, data subjects may ask the office information concerning the processing of their personal data by e-mail (career@ombudsman.europa.eu). If requested, the office provides them with a copy of their data undergoing processing, also by e-mail. Requests from data subjects shall be dealt with within one month.

Data subjects may also contact the office's Data Protection Officer at: 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) at the following address: EDPS@edps.europa.eu



Privacy Statement

relating to the internal selection procedures within the European Ombudsman's Office

This privacy statement explains the reason for collecting and processing the applicants' data; the way the European Ombudsman (EO) collects, handles and ensures protection of the data provided; how this information is used; and what rights the candidates may exercise in relation to their data.

The controller is the European Ombudsman.

1. What personal data will the European Ombudsman process?

We process the following data provided by the candidates:

- identification data (first name, last name);
- information contained in the CV (education, work experience, language proficiency, nationality, professional and private email addresses, etc.);
- if necessary, a statement sent by email, declaring any disability to ensure that the necessary accessibility measures can be put in place;
- information contained within any motivation letter;
- copies of the candidates' diplomas, if required;
- copies of the candidates' staff reports, if required;
- copies of evidence of professional experience, if required;
- replies of the candidates to the case studies, if applicable.

The staff members of the HR team responsible for selection procedures also process data, stored in a shared folder in the EO server, such as: the decisions appointing the Advisory Selection Committees, the eligibility notes approved by the Advisory Selection Committee and the EO; the candidates' evaluation grids; the pre-selection notes submitted to the EO.

The requests for review/for information sent by the candidates by email and the relevant replies are stored in the functional mailbox "Career".

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

The purpose of the data processing is to identify candidates for filling internal vacancies in the EO Office and to carry out the relevant internal selection procedure.



3. What is the legal basis and necessity for processing this data?

The legal basis of the internal selection procedures are the Staff Regulations (particularly Article 29.1 d Staff Regulations), the Conditions of Employment of Other Servants of the EU, the [Decision of the European Ombudsman of 1st December 2014 adopting general implementing provisions relating to the engagement and the use of contract staff](#) and the [Decision of the European Ombudsman on promotion of officials and reclassification of temporary and contract agents](#).

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

4. Who is responsible for processing the data?

The Director for Administration and the HR team are responsible for processing the data concerning the internal selection procedures.

5. Who will be the recipients of the data?

The EO, the Secretary General (SG), the Director for Administration, the staff members of the HR team responsible for selection procedures, and the members of the Advisory Selection Committee.

6. How long will the data be kept?

Data of unsuccessful applicants is deleted from the shared folder in the EO server and from the functional mailbox "Career" two years after the end of the selection procedure. Data of recruited candidates is kept for a period of 10 years as of the termination of employment, or as of the last pension payment after which time it is destroyed.



7. How do we protect the data subject's data?

The electronic data is stored on the Ombudsman's servers (shared folder). Data is protected by numerous security measures set up by the Information and Communication Technologies staff to protect the integrity and confidentiality of the Institution's electronic property. The staff member(s) of the HR team responsible for the internal selection procedures keep documents in paper related to the selection procedures (ex: applications, supporting documents) in locked cupboards on their office(s).

Access to personal data is protected through the management of access rights, which are strictly limited, under the 'need to know' principle, by the user's remit. Only the Director for Administration, the Head of the HR team and the staff members of the HR team responsible for internal selection procedures have access to it.

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 we use it.

You have also a right to request rectification of any incomplete or inaccurate data concerning you, provided that the confidentiality of the deliberations and decision-making of the Advisory Selection Committee is safeguarded, along with the rights of other applicants. You can rectify identification data at any time during the procedure. Concerning data related to admissibility or assessment criteria, the right of rectification can be exercised up until the closing date for the submission of applications.

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 we delete 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, you may send data protection related questions concerning the internal selection procedure to the EO, at the following address:

career@ombudsman.europa.eu

Director for Administration- HR team
European Ombudsman
1 avenue du Président Robert Schuman
CS 30403
F-67001 Strasbourg Cedex

You also may contact the Data Protection Officer of the European Ombudsman at the following address: DPO-Euro-Ombudsman@ombudsman.europa.eu



You may lodge a complaint with the European Data Protection Supervisor at any time at the following address: EDPS@edps.europa.eu