

European Ombudsman

Public record of processing activity:

Selection of trainees for the traineeships for persons with disabilities in the European Ombudsman's Office

1. Last update of this record: 06.02.2023

2. Reference number:

3. Name and contact details of the controller: European Ombudsman, 1 avenue du Président Robert Schuman, CS 30403, F-67001 Strasbourg Cedex - EO@ombudsman.europa.eu

Responsible department: Directorate for Administration of the European Ombudsman –HR Team - email: EOtraineeship@ombudsman.europa.eu

4. Name and contact details of the Data Protection Officer: Ms Francesca PAVESI-

Deputy DPO: Mr Nicholas HERNANZ

Email: Dpo-Euro-Ombudsman@ombudsman.europa.eu

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

6. Name and contact details of the joint controller(s): Medical Service of the European Parliament (EP)

In case of a request for reasonable accommodation, the EP Medical Service will assess the supporting documents to determine the validity of the requests for reasonable accommodation and propose the necessary arrangements to the EO.

Email: bmedical@ep.europa.eu

7. Purpose(s) of the processing: to identify candidates for the traineeship programme for persons with disabilities in the EO Office and to carry out the relevant selection procedure.

The legal basis are the [Decision of the European Ombudsman concerning traineeships of 13/02/23](#) the notice of the European Ombudsman on Traineeships 2023-Traineeship for persons with disabilities and Article 1 d (4) of the Staff Regulations of Officials and Conditions of Employment of Other Servants of the European Union¹ (reasonable accommodation)

Candidates provide their data through the online (website) application tool. For carrying out the selection procedure, the data are imported to an IT tool designed to support and facilitate the procedure.

¹ See Article 1 d (4) SR: (...) *Reasonable accommodation, in relation to the essential functions of the job, shall mean appropriate measures, where needed, to enable a person with a disability to have access to, participate in, or advance in employment, or to undergo training, unless such measures would impose a disproportionate burden on the employer.*"

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

- Categories of data subjects: candidates for the traineeships offered to people with disabilities

- Categories of personal data:

- Basic personal information (first name, last name, nationality, birth date, email, city and country of residence, telephone);
- information contained in the C.V. (education, work experience, language proficiency);
- the document(s) proving the disability (ex: a document issued by a national or regional authority or an accredited body in a Member State of the EU, an EU disability card, a recent certificate issued by a medical doctor)
- if applicable, a request for reasonable accommodation arrangements for the work during the traineeship, accompanied by proper justification of the need for reasonable accommodation²;
- copies of the applicant's diplomas, degrees, or certificates.

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

- Candidates' data submitted to the online (website) application tool are kept in their online personal account for two years in case candidates wish to apply to future traineeships. Candidates can ask the EO to delete their account at any time. If candidates for a traineeship do not connect to their account within two years, the account and the data contained in it are automatically deleted after a notification email is sent to the applicant.
- Data transferred to the selection tool concerning unsuccessful candidates are deleted nine months after the end of the period of traineeships for which data were collected. Data of candidates selected for traineeships are deleted two years after the end of their traineeship period.

10. Recipients of the data:

The EO, the Secretary General (if applicable), the Director for Administration, the Traineeships Officer, the Head of HR Unit, the Heads of inquiries units, the staff members involved in the candidates' assessment, and the ICT staff members.

In case of a request for reasonable accommodation, the EP Medical Service will assess the supporting documents to determine the validity of the request and propose the necessary arrangements to the EO. Only the Medical service shall have access to the documents submitted.

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

² Only the selected candidate will be requested to provide the relevant supporting documents to justify their request for reasonable accommodation. The EP Medical Service will assess the supporting documents to determine the validity of the request for reasonable accommodation and propose the necessary arrangements to the EO.

12. General description of security measures:

Data is collected online in secure mode. Access to the data through the online form is protected by the password of the applicant's choice.

The electronic data is stored in the on-line application tool, on the EO's servers which means that it is protected by numerous security measures set up by the ICT Sector to protect the integrity and confidentiality of the Institution's electronic property.

Only staff members of HR Unit will have access to the documents that certify the disability. Other staff members or the Selection Committee members do not have access.

The selected trainees requiring Reasonable Accommodation (RA) provide the details concerning the relevant request and the supporting documents to the EP Medical Service directly. The latter conducts a pre-assessment of the request for RA arrangements and submits its report to the Ombudsman's HR services.

13. Information on how data subjects can exercise their rights of access and rectification, and where applicable, of erasure, restriction and data portability³:

Candidates have the right of access to their own personal data and to relevant information concerning how we use it. They have also a right to request rectification of any incomplete or inaccurate data concerning them, provided that the confidentiality of the deliberations and decision making of the staff members involved in the candidates' assessment 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 criteria, the right of rectification can be exercised up until the closing date for the submission of applications.

Candidates have a right to object to the use of their data by the European Ombudsman on grounds relating to their particular situation, at any time. Under certain conditions, they have the right to ask that we delete their personal data or restrict its use. At any time, candidates may ask the Directorate for Administration- HR Team-information concerning the processing of their personal data by e-mail: EOtraineeship@ombudsman.europa.eu. They may also contact the office's Data Protection Officer at dpo-eo-ombudsman@ombudsman.europa.eu.

If they wish to complain about the EO'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

³ 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>