



**European Union Aviation Safety Agency**

FO Personal data processing records and compliance checklist - Public	Ref 033 V1 eRecruitment
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Nr.	Item	Explanation
<b>Staff selection procedures and recruitment</b>		
1.	Last update of this record	14.02.2023
2.	Reference number	033 V1
<b>Part 1 – Article 31 of Regulation (EU) 2018/1725 - Record (recommendation: Publicly available)</b>		
3.	Name and contact details of the controller and of the staff member responsible	Controller: European Union Aviation Safety Agency (EASA) Staff member responsible: Head of Human Resources Department; hr.info@easa.europa.eu
4.	Name and contact details of DPO	<a href="mailto:dpo@easa.europa.eu">dpo@easa.europa.eu</a>
5.	Name and contact details of joint controller (where applicable)	n/a
6.	Name and contact details of processor (where applicable)	Success Factors, SAP (privacy@SAP.com)  Other processors might be involved during the recruitment process in particular to carry out activities such as Assessment Centres, Proctored remote testing, asynchronous video interviews and Psychometric testing. Dedicated privacy notices and consent forms will be provided to candidates in the respective platforms. All such third parties are engaged through service contracts and are bound to process personal data in accordance with GDPR and Regulation 2018/1725 (applicable to EU bodies).
7.	Purpose of the processing	The purpose of the personal data processing is to evaluate the candidates' ability to perform the functions of the post for which a selection and recruitment procedure has been organised in order to select the best candidate for the position, in compliance with the requirements of the CEOS, implementing rules and vacancy notice.





8.	Description of categories of persons whose data are processed by EASA and list of personal data categories	<p><b>Categories of persons whose data are processed by EASA:</b> Candidates to recruitment procedures (incl. trainees and SNEs), staff members applying to internal mobility/recruitment procedures and interim staff engaged through the temporary employment agency.</p> <p>.</p> <p><b>Categories of personal data:</b></p> <ul style="list-style-type: none"> <li>- First name, surname; address; gender; nationality; data and place of birth</li> <li>- Concerning the data subject's career/employment history</li> <li>- concerning contact details to enable communication/exchange during recruitment process</li> <li>- in the form of personal identification numbers</li> <li>- concerning recruitment and contracts</li> <li>- concerning travel for recruitment purpose (such as medical pre-employment)</li> <li>- concerning assessment results</li> <li>- concerning declaration of interest, criminal record and pre-employment medical aptitude if applicable</li> </ul>									
9.	Time limit for keeping the data	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="3" style="text-align: center;">Disposal of personal data</th> </tr> <tr> <th style="width: 30%;"></th> <th style="width: 35%;">Recruited Candidates</th> <th style="width: 35%;">Non-recruited candidates<sup>1</sup></th> </tr> </thead> <tbody> <tr> <td style="vertical-align: top;"><b>Applications and Candidate Profiles in SuccessFactors e-recruitment<sup>2</sup></b></td> <td style="vertical-align: top;">Personal data from the recruitment file is transferred to the personnel file where it is stored for a period of 10 years after termination of service or upon payment of the last pension.</td> <td style="vertical-align: top;">2 years after expiry of the reserve list (including any extensions). When no reserve list is established, 2 years after closure of the recruitment process (job requisition) in the system.</td> </tr> </tbody> </table>	Disposal of personal data				Recruited Candidates	Non-recruited candidates <sup>1</sup>	<b>Applications and Candidate Profiles in SuccessFactors e-recruitment<sup>2</sup></b>	Personal data from the recruitment file is transferred to the personnel file where it is stored for a period of 10 years after termination of service or upon payment of the last pension.	2 years after expiry of the reserve list (including any extensions). When no reserve list is established, 2 years after closure of the recruitment process (job requisition) in the system.
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<sup>1</sup> This includes candidates placed on a reserve list but who are not offered a job at EASA or who do not take up a job offer.

<sup>2</sup> Should a candidate apply with the same candidate id to multiple selection procedures where different retention periods apply, the candidate id and the application forms will be deleted only once the latest retention period has reached. This is necessary for technical reasons linked to SuccessFactors.





		<p><u>Retention of personal data of candidates applying through the external provider (i.e. temporary employment agency):</u> data is kept for 2 years after closure of the recruitment process (job requisition) in the system.</p> <p>Spontaneous applications submitted outside SuccessFactors are generally not accepted and disposed at the latest 1 year after receipt of application.</p>
10.	Recipients of the data	<p>Human Resources department staff members responsible for the management of the selection and recruitment process. Members of selection panels (i.e. EASA staff members for the most, exceptionally external persons appointed to be part of the panel). The European Commission’s medical service in the context of the pre-employment medical check.</p> <p>When required, and where appropriate, access may be given to the Internal Audit Service, the European Ombudsman, the Civil Service Tribunal, the European Data Protection Supervisor and the European Court of Auditors.</p> <p>In case the Agency outsources services to third parties, such as, but not limited to, selection providers or test administrators (such as psychometric testing, asynchronous video interviews<sup>3</sup>, Assessment Centres, Proctored remote testing), personal data of the candidates may be shared with them in order to organise the procedure. Some assessments may be run in groups during which name and surname may be known to the other candidates.</p> <p>We may also share your personal data with other EU bodies or other third-parties within the EU when we are required to do so by law, including for monitoring, auditing or inspection purposes in accordance with European Union legislation.</p>

<sup>3</sup> An asynchronous video interview is a pre-recorded video interview where an applicant is guided through a series of structured interview questions and records the answers in front of a phone or computer camera. The key feature of an asynchronous video interview is that a candidate is not speaking with a recruiter in real time but recording the answers using video interview software. The interviewer is not online at the same time as the applicant. The Selection Board assesses recorded responses after recording is completed. There is no possibility of downloading interviews from the platform. Candidates invited to asynchronous video interviews receive a specific privacy statement explaining how their personal data is processed in relation to the performance of such interviews.





11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No
12.	General description of security measures, where possible.	<p>Candidates' personal data is stored and processed in the SAP SuccessFactors cloud and in the data centres of the aforementioned third parties.</p> <p>Regarding SAP SuccessFactors, data is stored in the cloud in servers in SAP Germany. External contractors/subcontractors may receive and process the data in the context of the contract with EASA for the maintenance and development of the applications supporting SAP SuccessFactors and integrations of SuccessFactors with Remedy and Insite.</p> <p>Login to SuccessFactors is via Username /password (password protected) or via SSO wherein SSO setup is based on SAML2.0 protocol and F5 being the EASA's corporate identity provider.</p> <p>Selection &amp; Recruitment files managed outside SuccessFactors are stored on a common drive with restricted access to the members of the HR department. Sensitive files are password protected. Hard copy recruitment files (such as criminal record) are kept in lockers, keys only accessible for the specific file handler.</p>
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the below privacy statement.	See privacy statement





## PRIVACY STATEMENT

### eRecruitment Ref33

#### 1. What personal data do we collect?

Categories of persons whose data are processed by EASA: Candidates to recruitment procedures (incl. trainees and SNEs), staff members applying to internal mobility/recruitment procedures and interim staff engaged through the temporary employment agency.

Categories of personal data:

- First name, surname; address; gender; nationality; data and place of birth
- Concerning the data subject's career/employment history
- concerning contact details to enable communication/exchange during recruitment process
- in the form of personal identification numbers
- concerning recruitment and contracts
- concerning travel for recruitment purpose (such as medical pre-employment)
- concerning assessment results
- concerning declaration of interest, criminal record and pre-employment medical aptitude if applicable

#### 2. For what purpose do we collect personal data and on which legal basis?

The purpose of the personal data processing is to evaluate the candidates' ability to perform the functions of the post for which a selection and recruitment procedure has been organised in order to select the best candidate for the position, in compliance with the requirements of the CEOS, implementing rules and vacancy notice.

##### Legal basis:

We process the candidate's personal data on the basis of their consent provided directly when registering to the e-recruitment system. Before registering you are asked to confirm your acceptance to the processing of the personal data as described in this privacy notice.





The selection and recruitment procedures are necessary for the management and functioning of the Agency. The processing of data is necessary for the performance of tasks carried out in the public interest as provided for under:

- ⇒ Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91
- ⇒ Staff Regulations of Officials (SR) and the Conditions of Employment of Other Servants of the European Communities (CEOS), in particular Art. 27-34 (SR) and Art. 12-15 and 82-84 (CEOS) and the applicable Implementing Rules for Temporary Agents and Contract Agents, Decision of the Executive Director on rules governing the secondment of national experts to the EASA (DECISION No 2009/169/E of the Executive Director of the agency of 11 December 2009 laying down rules on the secondment to the European Union Aviation Safety Agency of national experts) and Decision of the Executive Director on rules governing the traineeship programme at the EASA (ED Decision 2016/116/ED - Rules on EASA Graduate Traineeship Programme GTP).

### 3. Who may receive your personal data?

Human Resources department staff members responsible for the management of the selection and recruitment process. Members of selection panels (i.e. EASA staff members for the most, exceptionally external persons appointed to be part of the panel).

When required, and where appropriate, access may be given to the Internal Audit Service, the European Ombudsman, the Civil Service Tribunal, the European Data Protection Supervisor and the European Court of Auditors.

In case the Agency outsources services to third parties personal data of the candidates may be shared with them in order to organise the procedure.

These may be selection providers or test administrators, such as psychometric testing, asynchronous video interviews, Assessment Centres, Proctored remote testing. With automated proctoring, there is no live proctor (instructor) watching test takers during the exam. The candidate does the test in an online platform. Automated proctoring makes use of technology to monitor candidates while taking the exam. After the exam is submitted, HR will be notified of any infringements by candidates and the video recordings can be subject to human verification in that case. The recording is accessible only to specific trained HR staff, on a need-to-know basis.





Some assessments may be run in groups during which name and surname may be known to the other candidates.

We may also share your personal data with other EU bodies or other third-parties within the EU when we are required to do so by law, including for monitoring, auditing or inspection purposes in accordance with European Union legislation. Your personal data may be further processed for archiving purposes in the public interest and subject to appropriate safeguards.

4. How long are your personal data kept?

Disposal of personal data		
	Recruited Candidates	Non-recruited candidates <sup>4</sup>
<b>Applications and Candidate Profiles in SuccessFactors e-recruitment<sup>5</sup></b>	Personal data from the recruitment file is transferred to the personnel file where it is stored for a period of 10 years after termination of service or upon payment of the last pension.	2 years after expiry of the reserve list (including any extensions). When no reserve list is established, 2 years after closure of the recruitment process (job requisition) in the system.

Retention of personal data of candidates applying through the external provider (i.e. temporary employment agency): data is kept for 2 years after after closure of the recruitment process (job requisition) in the system.

Spontaneous applications submitted outside SuccessFactors are generally not accepted and disposed at the latest 1 year after receipt of application.

<sup>4</sup> This includes candidates placed on a reserve list but who are not offered a job at EASA or who do not take up a job offer.

<sup>5</sup> Should a candidate apply with the same candidate id to multiple selection procedures where different retention periods apply, the candidate id and the application forms will be deleted only once the latest retention period has reached. This is necessary for technical reasons linked to SuccessFactors.





## 5. What are your rights?

You have the right to request from EASA access to and rectification or erasure of your personal data or restriction of processing. You also have the right to object to processing of your personal data. You may also delete your candidate profile in SuccessFactors (you login, click settings > profile > delete profile).

You have the right to data portability.

You also have the right to withdraw at any time your consent for EASA to process your personal data. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

EASA should provide information on action taken on a request within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

A breach concerning your personal data should be communicated to you under certain circumstances. EASA should also ensure the confidentiality of electronic communications.

## 6. Who is the data controller and how to exercise your rights?

EASA should exercise the tasks of the data controller for the purpose of these processing operations.

To exercise the mentioned rights, you can contact the controller by sending an email to: [recruit@easa.europa.eu](mailto:recruit@easa.europa.eu)

If you consider your data protection rights have been breached, you can always lodge a complaint with the EASA's Data Protection Officer ([dpo@easa.europa.eu](mailto:dpo@easa.europa.eu)) or with the European Data Protection Supervisor: [edps@edps.europa.eu](mailto:edps@edps.europa.eu).

