**RECORD OF A PERSONAL DATA PROCESSING ACTIVITY**  
according to Article 31 of Regulation (EU) 2018/1725

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<td><strong>Onboarding of new staff members and trainees at EFSA</strong></td>
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1) **Controller(s) of data processing activity (Article 31.1(a))**

EFSA unit in charge of the processing activity: Human Capital Unit (HuCap)

EFSA Data Protection Officer (DPO): DataProtectionOfficer@efsa.europa.eu

Is EFSA a co-controller? **No**

2) **Who is actually conducting the processing? (Article 31.1(a))**

The data is processed by EFSA itself  

*Indicate the EFSA units or teams involved in the data processing:*

The controller can be contacted writing to HRS.onboarding@efsa.europa.eu

The processing operation is conducted together with an external party

*Please provide below details on the external involvement:*

3) **Purpose of the processing (Article 31.1(b))**

In view of confirming recruitment as a staff member or as a trainee at EFSA, the candidate needs to provide a series of documents collected by means of the EFSA e-recruitment system. The onboarding process is digitalised, in a sense that the candidate for recruitment or traineeship at EFSA is requested to upload the required documentation in a dedicated section of EFSA’s e-recruitment system.

The purpose of the onboarding process and the provision of related documents by candidates is to complete the formal steps related to their recruitment as a staff member or as a trainee at EFSA, in accordance with the conditions for employment laid down in the Staff Regulations.

4) **Legal basis and lawfulness of the processing (Article 5(a)–(d)):**

*Processing necessary for:*

(a) a task carried out in the public interest or in the exercise of official authority vested in EFSA  

*
(b) compliance with a legal obligation to which EFSA is subject

(c) performance of a contract with the data subject or to prepare such contract

(d) The data subject has given consent (ex ante, explicit, informed)

Further details on the legal basis:
The legal basis for the onboarding process is provided by:
- The Staff Regulations and the Conditions of Employment of other Servants of the European Union (CEOS);
- The Decision of the EFSA Management Board of 18 June 2018, laying down general implementing provisions on the procedure governing the engagement and use of temporary staff under Art. 2(f) of the CEOS;
- The Decision of the EFSA Management Board of 18 June 2018, laying down general implementing provisions for implementing Art. 79(2) of the CEOS, governing the conditions of employment of contract staff employment under the terms of Art. 3(a) of those conditions for employment.

5) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are processed?

| EFSA statutory staff | ✓ |
| Other individuals working for EFSA (consultants, trainees, interims, experts) | ✓ |
| Stakeholders of EFSA, including Member State representatives | ☐ |
| Contractors of EFSA providing goods and services | ☐ |
| The general public, including visitors, correspondents, enquirers | ☐ |
| Relatives of the data subject | ☐ |
| Other categories of data subjects (please detail below) | ☐ |

Further details concerning the data subjects whose data are processed:

6) Type of personal data processed (Article 31.1(c))

- **General personal data**
The personal data concerns:

  | Name, contact details and affiliation | ✓ |
  | Details on education, expertise, profession of the person | ✓ |
  | Curriculum vitae | ✓ |
### Financial details

- [X]

### Family, lifestyle and social circumstances

- [X]

### Goods and services the person provides

- [ ]

### Other personal data (please detail):

- [ ]

#### Sensitive personal data (Article 10)

The personal data reveals:

- [ ] Racial or ethnic origin of the person
- [ ] Political opinions or trade union membership
- [ ] Religious or philosophical beliefs
- [ ] Health data or genetic or biometric data
- [ ] Information regarding the person’s sex life or sexual orientation

**Further details concerning the personal data processed:**

- Documents needed prior to employment at EFSA: Proof of studies, Proof of employment, Proof of EU member state or EFSA Partner Country nationality, Sworn affidavit or certificate that no criminal record exists, Birth certificate, Proof of fulfilment of military service obligations

- Documents needed for the identification of individual entitlements: Proof of residence, Legal document stating current family status, Birth certificate of children, Document showing any family allowance, The last tax declaration/payslip of your spouse or recognized partner, Confirmation on your already established place of origin

- Other documents: Request form - Contribution travel expenses, Legal Entity Form (LEF) / Bank Account Form (BAF), Medical Insurance (trainees), Medical fitness, VISA (for non-EU trainees), Determination of rights form, Allowances received from other sources form, Change of place of origin form, Third language form, Declaration of confidentiality form, Fiscal residence form, Installation allowance form, JSIS confidentiality form, Travel expenses form, Request advance salary form

### 7) Recipients of the data (Article 31.1(d))

| Line managers of the data subject | [ ] |
| Designated EFSA staff members | [X] |
| Other recipients (*please specify*) | [X] |

The access to personal information and documents provided in the context of the onboarding process is managed on a ‘need-to-know’ basis by means of role-based access control and
account management in the e-recruitment tool (‘Access Management procedure for the Talent Management Solution’). This procedure aims at ensuring that the information is only disclosed to authorised recipients including:

- HuCap Unit staff in charge of talent selection, staff recruitment and trainees’ selection,
- On a need to know basis, the Finance Unit and other units within the Business Services Department of EFSA regarding the determination of the administrative status and rights and the payment of salaries and allowances,
- Access can be granted on request to bodies in charge of auditing, control and judicial review, including the European Ombudsman, the European Data Protection Supervisor, OLAF, the European Court of Auditors, the Civil Service Tribunal.

8) Transfers to recipients outside the EEA (Article 31.1 (e))

Data are transferred to third country recipients:

Yes [ ] No [x]

If yes, specify to which third country:

If yes, specify under which safeguards:

- Adequacy Decision of the European Commission [ ]
- Standard Contractual Clauses [ ]
- Binding Corporate Rules [ ]
- Memorandum of Understanding between public authorities [ ]

9) Technical and organisational security measures (Article 31.1(g))

How is the data stored?

- On EFSA’s Document Management System (DMS) [ ]
- On a shared EFSA network drive or in an Outlook folder [ ]
- In a paper file [ ]
- Using a cloud computing solution (please detail the service provider and main characteristics of the cloud solution, e.g. public, private) [x]
- On servers of an external service provider [ ]
- On servers of the European Commission or of another EU Institution [ ]
- In another way (please specify): [ ]

Please provide some general information on the security measures applied:
EFSA’s e-recruitment system, accessible via the EFSA website, is supported by the Oracle Taleo Cloud, configured taking account of ex ante impact assessment in the sense of Article 39 of the Data Protection Regulation. The system is accommodated with state-of-the-art security measures and data is stored securely in ISO certified data centres located inside the European Union. In addition, function-based access control and account management has been established.

10) Retention period (Article 4.1 (e))

All personal information and documents with the exception of the sworn affidavit or certificate on criminal record, will be downloaded from the e-recruitment system by HuCap staff in charge and transferred to your personal file in the sense of Article 26 of the Staff Regulations, which is maintained in a paper and in electronic format in the SYSPER system for your entire career/traineeship duration at EFSA. After recruitment confirmation, the sworn affidavit or certificate on criminal record is either returned to you or destroyed and replaced in the personal file with an acknowledgement or receipt.

11) Consultation with the Information Security Officer

Was the ISO consulted on the processing operation?

Yes ☒ No ☐

If yes, please provide some details on the consultation with the ISO:
The ISO was involved on the information security aspects of the Oracle Taleo customization.

12) Information given to data subjects (Articles 15 and 16)

Has information been provided to data subjects on the way their data is processed including how they can exercise their rights (access, rectification, objection, data portability)? Usually this information is provided in a Privacy Statement, specifying the controller’s contact details. As possible, please provide a link to the relevant Privacy Statement or a description.

A Privacy statement concerning the onboarding of new staff members and trainees at EFSA is available on the EFSA website:

Last update of this record: 04/08/2021
Reference: DPO/HR/12