



Protection of personal data in EFSA talent selection and recruitment processes

1. Brief description of the EFSA talent selection as a processing operation

Staff selection and recruitment at EFSA is based on open selection procedures based on transparency and equity. EFSA's processes are supported by an Oracle Taleo Cloud electronic system, designed to simplify the application process for candidates and to maximise EFSA's screening and selection efforts. EFSA's career opportunities are available on a dedicated 'EFSA careers' page in the website, divided in separate sections: staff, experts, trainees, secondments and fellows, covering the recruitment of statutory staff (temporary agents and contract agents), the selection of members of the EFSA scientific committee, scientific panels and working groups, traineeships, the selection of seconded national experts (SNEs - civil servants from national authorities), guest visitors and fellows under the European Food Risk Assessment Fellowship Programme (EU-FORA). Persons interested can create their general candidate profile in the e-recruitment tool and submit their application for a specific vacant position. Documents pertaining to the evaluation and selection stage, such as the report with scoring of applications for each vacancy and the scoring grids of online and live interviews are also collected in the tool. The pre-employment medical visit, if so required, is a specific step in the recruitment process, however due to its particularity and the involvement of the EFSA Medical Adviser in charge of processing the candidate's health data, it is dealt with in a separate data protection notice.

Shortlisted candidates have to undergo an online video interview which is supported by a dedicated tool - sonru.com

To add also that for the recruitment of managerial staff, the shortlisted candidates are invited to an interview with the Executive Director and they shall take part in an assessment centre, provided by an external service provider of EFSA.

Personal data processing in any manner in the context of EFSA talent selection and recruitment processes, including the electronic processing, shall be compliant with Regulation (EU) 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

The present note contains the information required in accordance with Article 15 and 16 of the Regulation.

References in this note to 'you', means you as an individual candidate or applicant for a vacant position or belonging to one of the groups of EFSA's workforce.



2. Purpose

The objective of the EFSA talent selection and management is to attract, retain and develop talented and engaged human resources, more particularly:

- To support selection and recruitment procedures of EFSA for statutory staff, trainees, experts, seconded national experts, guest visitors and EU-FORA fellows;
- Specifically for what concerns the statutory staff, to support the management of competencies based on the individual profiles and to facilitate the staff workforce allocation management.

3. Information on the controller and data protection officer

- The Head of Business Services Department (BuS) is the controller of the data processing in the context of selection and recruitment, including the use of the electronic support tools. Data processing by means of the tools is mainly entrusted to the Human Capital Unit (HUCAP), Talent Selection Team who can be contacted writing to: recruitment@efsa.europa.eu
- EFSA's data protection officer can be contacted writing to DataProtectionOfficer@efsa.europa.eu

4. Categories of personal data processed

- Data input by you as a user of the e-recruitment tool, including the general profile information: your name, contact and identification details, education, employment history, certifications, preferences (trainees, SNEs), publication list (experts, EU-FORA candidates). Fields for which information is compulsory are marked with an asterisk in the e-recruitment tool;
- Evaluation data input in the tool throughout the selection and recruitment process for each vacancy, including the report with scoring of applications, scoring grids from online and live interviews;
- Information on the competence profiles of staff and experts contained in the tool.

5. Who has access to the data and to whom is it disclosed?

- The access to personal data is managed on a need-to-know basis by means of function-based access control and account management for the e-recruitment tool (*'Access Management procedure for the Talent Management Solution'*). This procedure aims at ensuring that the information only is disclosed to authorised recipients, including: HUCAP Unit staff in charge of talent selection, appointed members of the Selection Board for a specific vacancy, the Executive Director in his capacity as Appointing Authority or any delegation thereof;
- For traineeships: Heads of Unit selecting trainees who applied to a traineeship call or other staff who would work with the trainees;
- Should the candidate's name be put on a reserve list and should a similar vacancy arise in another Unit, the Head of Unit to which the vacancy belongs can have access to the candidate application and evaluation;
- Specifically for the EU-FORA Programme: staff of the Engagement and Cooperation Unit (ENCO) in charge of the evaluation of candidates and hosting organisations in EU Member States operating in fields within EFSA's mission in accordance with Article 36 of the EFSA Founding Regulation. The organisations hosting the fellows are also on an annual basis involved in the final step of the selection process. To that end the hosting organisation receives data of the shortlisted candidate fellows.
- For the competence profiles of staff and experts, the access to the tool is limited to the data subject (staff member, expert), the data subject's line managers and the HUCAP staff in charge;
- 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.
- The annual list of selected EU-FORA fellows is published on the EFSA website.

6. Information security

The Oracle Taleo Cloud electronic system supporting the EFSA talent selection has been configured taking account of an impact assessment in the sense of Article 39 of Regulation (EU) 2018/1725. EFSA's configuration of Taleo generally complies with the requirements of the General Data Protection Regulation (EU) 2016/679 (GDPR). The tool 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 (see above).



7. How can you access your data and how can you exercise your other rights as a data subject?

As a candidate, you can exercise your data subject rights of access and rectification by means of password authentication in the e-recruitment tool and you are able to edit your application until the procedure closing date. You are able to update or correct at any time your general profile data in the tool.

In case of problems in exercising your rights by means of the self-service in the e-recruitment tool, you can contact the HUCAP Talent Selection Team, using the above contact details.

The on-line system incorporates an automatic notification to job applicants/data subjects, helping them in exercising their access right and other related rights.

8. Retention period of personal data

The following conservation periods are applied:

- Profile information: The profile information of users in the electronic tool is maintained to facilitate their preparation of any future applications for recruitment or selection at EFSA. EFSA will carry out periodical screenings and delete inactive profiles on a 5-years basis;
- Application specific information for recruited staff, SNEs, trainees, experts, guest visitors and EU-FORA fellows: the application specific data is stored until 5 years after the termination of their appointment;
- Application specific information related to non-recruited staff, SNEs, trainees, experts, guest visitors and non-selected EU-FORA candidates: Personal data contained in supporting documents is deleted where possible when the data is not necessary for budgetary discharge, audit and control purposes at expiry of a 2-years retention period;
- Application specific information related to non-recruited staff, SNEs, trainees, experts and guest visitors applicants entered on a reserve list: The retention period indicated in the previous point will be extended until the expiry of the reserve list;
- Documents related to recruited Temporary Agents and Contract Agents are kept in their personal file in accordance with Art. 26 of the Staff Regulations. EFSA keeps personal files until 5 years after the jobholder has terminated employment



provided there are no pending claims or any other open issues concerning the EFSA employment relationship. The same retention is applied for recruited SNEs.

9. Lawfulness of processing and legal basis

Personal data processing in the context of EFSA talent selection and recruitment is necessary for the performance of tasks carried out in the exercise of official authority vested in EFSA as an agency of the European Union and for the compliance with the legal obligations to which it is subject in the sense of Article 5(1)(a) and (b) of Regulation (EU) 2018/1725. The specific legal basis is provided by:

- EFSA's Founding Regulation (EC) n° 178/2002 of the European Parliament and of the Council laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety and especially Article 36 thereof for what concerns the EU-FORA fellowships;
- The Staff Regulations (SR) and the Conditions of Employment of Other Servants of the European Communities (CEOS), in particular Art. 27-34 (SR), Art. 12-15 (CEOS) and Art. 82-84 (CEOS);
- Decision of the Executive Director laying down the Rules Applicable to National Experts on Secondment to EFSA;
- Decision of the Executive Director on the Traineeship Scheme at EFSA;
- Decision of the Executive Director on the Guest Programme Scheme at EFSA;
- Decision of the Executive Director concerning the selection of members of the Scientific Committee, the scientific panels and the selection of external experts to assist EFSA with its scientific work of 22 May 2017.
(https://www.efsa.europa.eu/sites/default/files/corporate_publications/files/expertselection.pdf).

10. Specific information on the processing of personal data in the context of the online video interview service - sonru.com

- The Sonru service supports the selection and recruitment process of different EFSA populations and consists of a facility to remotely interview individuals online, with related video recording and storage. The service is provided by sonru.com, contracted for that purpose and acting as a processor under the control of EFSA;
- The purpose of the online video interview service is to assess the English language proficiency and the soft skills of candidates in the selection processes for the different groups. The video interview forms a preliminary step in the selection process aiming at better pooling candidates for a subsequent live interview at EFSA;



- The sonru.com service is accommodated with state-of-the-art security measures and video data is stored securely in ISO certified data centres located inside the European Union;
- The interview content is collected and stored on hosting servers of the sonru.com service provider, acting as a processor under the control of EFSA. This means that sonru.com facilitates the recording of the interviews and their storage for secure access by EFSA's nominated representatives. Only EFSA staff in charge of the selection (members of the Selection Board, individual staff members of the HUCAP Unit) is able to access data on a strict need-to-know basis and following secure personalised system authentication. Personal data will not be transmitted to any other recipients and not either be used for any unrelated purpose such as direct marketing;
- As a candidate in the selection process for a position at EFSA, **you have the right to opt-out** from the online interview service, asking EFSA for a live interview as an alternative. If you wish to opt-out, please contact the HUCAP Unit of EFSA using the contact details above. In such case, you will be invited for a live interview at a specific date and time fixed unilaterally by EFSA according to the availability of the Selection Board members. Opting out from the online interview by choosing for the alternative of a live interview is without any prejudice to your chances as a candidate in the relevant selection procedure;
- The interview content is kept until three months after the closure of the selection procedure in question except in the event of a challenge or complaint with regard to the selection procedure in question. After the three months' period or the settlement of the relevant challenge, the interview content is permanently deleted from the servers hosting the sonru.com service;
- Should you want to verify your personal data stored in the system, have it modified, corrected or deleted, please contact the HUCAP Unit of EFSA by writing to recruitment@efsa.europa.eu.

11. Specific information on the processing of personal data in the context of the external assistance in staff selection including the assessment centre for the recruitment of managerial staff

- EFSA relies on specialised service provision in the area of staff selection, based on procurement contracts. The assistance from external service providers may comprise the following tasks: (1) Applications screening, (2) Screening interviews of shortlisted candidates, (3) Support during interviews with the Selection Board, (4) Psychometric testing, (5) Online proctored tests, (6) Assessment centre for the recruitment of targeted job profiles and levels, (7) Ad hoc consultancy.



- Specifically as concerns the task (6), it shall be clarified that pursuant to Article 9(1)(b) of the EFSA Decision on middle management staff of 11/10/2018, Head of Unit functions shall take part in an Assessment centre as a step of the selection and appointment process.
- The service providers for the assistance in staff selection have been selected following an inter-agency open call for tenders with ref. OC/EFSA/HUCAP/2019/02. In accordance with Regulation (EU) 2018/1725 (EDPR) and specifically Article 29 thereof, the Framework Contracts include specific conditions for personal data processing. Given the fact that certain tasks of the contractors in staff selection assistance may entail specific risks to the rights and freedoms of the candidates under recruitment, those parts of the service provision are subject to a Data Protection Impact Assessment in accordance with Article 39 EDPR and the resulting mitigation actions and recommendations are to be implemented under the Framework Contracts.

12. Right to lodge a complaint with the EDPS

As a data subject, you have a right to lodge a complaint on the processing of your personal data in the context of EFSA selection and recruitment processes with the European Data Protection Supervisor - edps@edps.europa.eu