



## RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

according to Article 31 of [Regulation \(EU\) 2018/1725](#)

Title
<b>Selection and recruitment procedures of staff and non-statutory workforce at EFSA including trainees, SNEs, experts and fellows</b>
1) Controller(s) of data processing activity (Article 31.1(a))
<p>EFSA unit in charge of the processing activity: Human Capital Unit (HUCAP)</p> <p>EFSA Data Protection Officer (DPO): <a href="mailto:DataProtectionOfficer@efsa.europa.eu">DataProtectionOfficer@efsa.europa.eu</a></p> <p>Is EFSA a co-controller? <span style="margin-left: 100px;"><b>No</b></span></p> <p><i>If yes, indicate who is EFSA's co-controller:</i></p>
2) Who is actually conducting the processing? (Article 31.1(a))
<p>The data is processed by EFSA itself <span style="float: right;"><b>X</b></span></p> <p><i>Indicate the EFSA units or teams involved in the data processing:</i></p> <p>HUCAP Unit staff (Talent Selection team)</p> <p>The processing operation is conducted together with an external party <span style="float: right;"><b>X</b></span></p> <p><i>Please provide below details on the external involvement:</i></p> <p>The EFSA selection and recruitment process for staff and experts is accomodated with involvement of external service providers, namely:</p> <ul style="list-style-type: none"> <li>• Oracle Taleo &amp; Human Capital Management system</li> <li>• Modern Hire / Sonru platform (SaaS cloud) for online interviewing, recording and storage</li> <li>• Contracted service provider for assistance in selection procedures, i.e. providing the Assessment Centre</li> </ul> <p>For more details on the external service provision, see point 9.</p>
3) Purpose of the processing (Article 31.1(b))
<p>To organise selection procedures for Officials, Temporary Agents and Contract Agents (statutory staff), as well as experts and Seconded National Experts and Trainees at EFSA, guest visitors and EU-FORA fellows by means of external selection and internal mobility (for TAs only).</p> <p>For statutory staff specifically, to support the management of competencies based on the individual profiles and to facilitate the staff workforce allocation management.</p>

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 | <input checked="" type="checkbox"/> |
| (b) compliance with a legal obligation to which EFSA is subject                                       | <input checked="" type="checkbox"/> |
| (c) performance of a contract with the data subject or to prepare such contract                       | <input type="checkbox"/>            |
| (d) The data subject has given consent (ex ante, explicit, informed)                                  | <input type="checkbox"/>            |

*Further details on the legal basis:*

- 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 EUFORA 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](https://www.efsa.europa.eu/sites/default/files/corporate_publications/files/expertselection.pdf))

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

*Whose personal data are processed?*

- |   |                                     |
|---|-------------------------------------|
| EFSA statutory staff  | <input checked="" type="checkbox"/> |
| Other individuals working for EFSA (consultants, trainees, interims, experts) | <input checked="" type="checkbox"/> |
| Stakeholders of EFSA, including Member State representatives                  | <input type="checkbox"/>            |
| Contractors of EFSA providing goods and services                              | <input type="checkbox"/>            |
| The general public, including visitors, correspondents, enquirers             | <input type="checkbox"/>            |
| Relatives of the data subject   | <input type="checkbox"/>            |
| Other categories of data subjects (please detail below)                       | <input type="checkbox"/>            |

*Further details concerning the data subjects whose data are processed:*

Officials, Temporary Agents, Contract Agents, Seconded National Experts, Trainees engaged at EFSA, members of the EFSA scientific committee, scientific panels and working groups, and guest visitors and fellows under the European Food Risk Assessment

Fellowship Programme (EU-FORA).

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

### a) General personal data

The personal data concerns:

Name, contact details and affiliation	<input checked="" type="checkbox"/>
Details on education, expertise, profession of the person	<input checked="" type="checkbox"/>
Curriculum vitae	<input checked="" type="checkbox"/>
Financial details	<input checked="" type="checkbox"/>
Family, lifestyle and social circumstances	<input type="checkbox"/>
Goods and services the person provides	<input type="checkbox"/>
Other personal data (please detail):	<input type="checkbox"/>

### b) Sensitive personal data (Article 10)

The personal data reveals:

Racial or ethnic origin of the person	<input type="checkbox"/>
Political opinions or trade union membership	<input type="checkbox"/>
Religious or philosophical beliefs	<input type="checkbox"/>
Health data or genetic or biometric data	<input type="checkbox"/>
Information regarding the person's sex life or sexual orientation	<input type="checkbox"/>

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

- Data input by the users in the e-recruitment tool, including the application of candidates in the context of recruitment and selection procedures, consisting of data allowing the candidate to be identified, i.e. surname, first name, date of birth, gender; Information provided by the candidate to allow the practical organisation of pre-selection and other tests, i.e. address information: street, postcode, town, country, telephone, fax, e-mail; Information provided by the candidate to verify whether he/she fulfils the eligibility and selection criteria laid down in the vacancy notice, i.e. nationality, languages, education, employment record, military/civil service record, certifications, preferences (trainees, SNEs), publication list (experts, EUFORA candidates). Fields for which information is compulsory are marked with an asterisk in the e-recruitment tool;

- Evaluation data input in the system throughout the recruitment and selection procedures 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.

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

- Line managers of the data subject
- Designated EFSA staff members
- Other recipients (*please specify*):

The access to personal information is managed on a 'need-to-know basis' by means of role-based access control and account management in the electronic 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, 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.

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

Data are transferred to third country recipients:

Yes  No

**If yes**, specify to which third country:

Related to the e-recruitment system Oracle Taleo & Human Capital Management system, transfers happen to Oracle affiliates in the US and worldwide

**If yes**, specify under which safeguards:

- Adequacy Decision of the European Commission
- Standard Contractual Clauses

Binding Corporate Rules	<input checked="" type="checkbox"/>
Memorandum of Understanding between public authorities	<input type="checkbox"/>

## 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)

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:*

The selection of EFSA staff and experts is supported by an electronic tool based on Oracle SaaS cloud technology (Oracle Fusion Human Capital Management - HCM), including a recruitment module formerly known as 'Taleo'. The platform consists of dedicated modules, namely (1) a general person profile accessible and editable by each user (2) a specific recruitment module for application submission concerning open internal and external positions published by EFSA (3) login access for the user to his/her profile and applications using the access credentials (4) specific module to support appointed Selection Board members in the selection process.

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).

As part of the EFSA staff/experts recruitment and selection process, and besides the Oracle Taleo system, other tools and services are applied namely:

- Provided the candidate gives his/her consent, remote interviewing online with related video recording and storage. The service is provided as SaaS cloud tool by the company Modern Hire/Sonru. The access to interview recordings is restricted to HUCAP Unit staff in charge and members of the EFSA Selection Board. The interview recordings are kept as long as the recruitment process is ongoing and erased from any storage devices afterwards. The data centres for storage are located within the European Economic Area. Transfers outside the EEA should take place, but if happening these comply with the requirements of Chapter V of Regulation (EU) 2018/1725. In case the candidate does not provide consent for

the use of the Modern Hire/Sonru platform for undergoing the interview, EFSA provides for the interview on a non-discriminatory basis in an alternative manner.

- EFSA may rely on the assistance of a contracted service provider, such as for providing the Assessment Centre in the context of the recruitment of managerial staff, as well as other assistance services in the context of staff recruitment and selection proceedings.

#### 10) Retention period (Article 4.1 (e))

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, including for the membership of scientific panels which is renewed every 5 years. EFSA will carry out periodical screenings and delete inactive profiles on a 7-years' basis;
- Application-specific information and supporting documents related to non-recruited staff, SNEs, trainees, experts, guest visitors and non-selected EU-FORA candidates: Personal data is deleted when the information is no longer necessary for budgetary discharge, audit and control purposes or legal challenges. In practise, the information is kept for a period of 3 years as from the closure of the selection process. When a reserve list is established, the 3 years retention period starts from the expiry date of the reserve list;
- Application-specific information for recruited staff, SNEs, trainees, experts, guest visitors and EU-FORA fellows is stored until 5 years after the termination of their appointment.

#### 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:*

On the occasion of the selection of the Oracle SaaS cloud technology (Oracle Fusion Human Capital Management - HCM), including the recruitment module 'Taleo', a Data Protection Impact Assessment (DPIA) and Security Plan (SP) was carried out and adopted by the Head of Department Resources & Support on 22/04/2016.

The DPIA/SP on Oracle HCM/Taleo is available with EFSA.

The ISO has assessed the Modern Hire/Sonru platform for online interviewing and storage on compliance with information security standards.

## 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.*

Data subjects can exercise their rights of access and rectification by means of password authentication in the Taleo tool. Candidates in staff recruitment and expert selection procedures are able to edit their application until the procedure closing date. Taleo users can update their personal profile at any time. On the other hand, data demonstrating compliance with the eligibility and selection criteria for a specific position may not be updated or corrected after the closing data for the respective selection procedure. In case of need for further assistance, the HUCAP staff in charge can be contacted - [recruitment@efsa.europa.eu](mailto:recruitment@efsa.europa.eu)

Website note 'Protection of personal data in relation to selection and recruitment of officials, temporary agents, seconded national experts and trainees' -

<https://www.efsa.europa.eu/sites/default/files/TMTdataprocessing.pdf>

Last update of this record: 13/04/2021

Reference: DPO/HR/1