

I. RECORD OF PERSONAL DATA PROCESSING OPERATION (Article 31 of Regulation (EU) No. 2018/1725)

1.	Name of the processing operation	Selection of statutory staff, trainees, interns, SNEs, NEPTs
2.	Reference number/Issue	ETF-DPR-31
3.	Date	09/07/2026
4.	Process owner	Vira Medynska Head of PAT Unit Vira.Medynska@etf.europa.eu
5.	Correspondent	Serena Visceglia HR Officer Serena.Visceglia@etf.europa.eu
6.	Controller	Pilvi Torsti Director of the ETF Pilvi.Torsti@etf.europa.eu
7.	Joint controller(s)	Not applicable
8.	Processor(s)	Service providers/contractors in charge of assessment centre, Providers of remote test invigilation
9.	Data protection officer	Tiziana Ciccarone, DataProtectionOfficer@etf.europa.eu
10.	Purpose of the processing	To manage applications and selection procedures for statutory staff, trainees, interns, SNEs and NEPTs, including the verification of eligibility and the assessment of candidates' qualifications, competencies and professional experience for recruitment, traineeship, internship or secondment at the ETF.
11.	Legal basis for the processing	• Staff Regulations and Condition of Employment of Other Servants of the European Union (CEOS); • ETF Governing Board Decision ref. GB/15/DEC/009 - Implementing provisions on the procedure governing the engagement and the use of temporary staff; • ETF Governing Board Decision ref. GB/19/DEC/010 - General provisions for implementing Article 79(2) of the CEOS of the EU, governing the conditions of employment of contract staff employed under the terms of Article 3a thereof; • ETF Governing Board Decision ref. GB/18/DEC/014 on middle management staff; • ETF Governing Board Decision ref. GB/15/DEC/019 - Rules on the secondment of national experts (SNE) as regards recruitment; • ETF Director's Decision ref. ETF-26-DEC-001– Traineeship policy; • Declaration of intent with UNITO (13/04/2026).
12.	Categories of data subjects	Candidates participating to the ETF selection procedures for CEOS statutory staff, SNE, trainees, curricular internships and

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		NEPTs
13.	Categories of personal data	Name, gender, nationality, date of birth, contact details, address and email address. Other voluntary information and data provided by the data subject, including potentially sensitive data (e.g. medical conditions).
14.	Time limits for the retention of data	Documents are retained by the ETF for 3 years calculated by the conclusion of the selection procedure or by the end of the validity (or extended validity) of reserve lists. Tests and video recordings related to remote invigilation are retained by the external provider for a maximum period of 6 months, taking into account the possibility of a complaint under Article 90(2) of the Staff Regulations.

15.	Categories of ETF internal recipients of data	HR Selection Team, Board members, alternate Board members, Board observers and the Appointing Authority have access to applications and documents related to the selection procedures. In addition, Heads of Units may have access to applications and selection final reports for the purpose of identifying the candidate in reserve lists who has the profile that matches best ETF needs.
16.	Categories of external recipients of data	Employer of SNEs and NEPTs; partners (including civil society organisations) involved in traineeships, curricular internships and/or external board members; external service providers responsible for assessment centres, testing platforms, remote invigilation and related evaluation services.
17.	Transfers of data to third country or international organisation	Not applicable

18.	Technical and organisational security measures	• Electronic applications are stored in the recruitment portal SharePoint database • Electronic documents are kept in the HR Team network partition with restricted access to the HR selection team • Paper documents are stored inside closed cupboards in the HR offices with restricted access.
19.	Information to the data subject	The relevant Privacy Statement is available on the ETF website

II. COMPLIANCE CHECK AND RISK SCREENING OF PERSONAL DATA PROCESSING OPERATION (Article 26 and 39 of Regulation (EU) No. 2018/1725)

This section is not systematically applicable to all processing operations. It shall be completed only where the nature, scope, context or risks of the processing so require, in accordance with Articles 26 and 39 of Regulation (EU) 2018/1725.

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A. Compliance check

20.	Lawfulness (Legal basis and necessity for processing, point 10) ☐ Necessary for performance of tasks in the public interest attributed by EU or MS legislation ☒ Necessary for the management and functioning of the organisation ☒ Necessary for compliance with legal obligation incumbent on controller ☐ Necessary for performance of a contract to which the data subject is party ☐ The data subject has given consent ☐ Necessary in order to protect the vital interests of the data subject or of another natural person	Details (if needed)
21.	Purpose definition (Point 9) A) Do you list all purposes? B) Are the purposes specified, explicit, legitimate? C) Where information is also processed for other purposes, are you sure that these are not incompatible with the initial purpose(s)?	A) Yes ☒ No ☐ B) Yes ☒ No ☐ C) Not Applicable
22.	Data minimisation (Point 12) D) Do you really need all data items you plan to collect? E) Are there any you could do without?	D) Yes ☒ No ☐ E) Yes ☐ No ☒
23.	Accuracy (Point 12) F) How do you ensure that the information you process about people is accurate? G) How do you rectify inaccurate information?	F) Information processed is provided by data subject and is therefore deemed to be accurate G) Information deemed to be inaccurate is promptly rectified by relevant officer in charge

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24.	Storage limitation (Point 13) H) Explain why you chose the storage period(s) mentioned I) Are they limited according to the maximum or minimum “as long as necessary, as short as possible”? J) In case you only need some information for longer, can you split storage periods?	H) The selected period of 3 years, following the conclusion of the selection procedure or the end of the validity (or extended validity) of the reserve list, is considered appropriate for administrative reasons and particularly in view of granting the necessary timeframe for possible appeals I) As short as possible J) Not Applicable
25.	Transparency (Point 18) K) How do you tell people about your processing? L) If you do not want to inform people (or only inform them after the fact), consult your DPO	K) Information is provided to data subject by means of a Privacy Statement, which is available in each vacancy notice, as well as published on the ETF website dedicated area L) Not Applicable
26.	Data subjects rights (Point 18) M) Can people contact you if they want to know what you have about them, want to correct or delete the data, have it blocked or oppose to the processing? N) Could there be situations where you would want to refuse e.g. granting access? In case so please describe them	M) Yes ☒ No ☐ N) Yes ☐ No ☒ Click or tap here to enter text.

B. Risk screening

27.	Does the processing involve any of the following?	
	- Data relating to health, (suspected) criminal offences or otherwise considered sensitive - Evaluation, automated decision- making or profiling - Monitoring data subjects - New technologies that may be considered intrusive	☒ Yes ☐ No
	- Exclusion databases - Large-scale processing of special categories of personal data (disease surveillance, pharmacovigilance, central databases for law-enforcement cooperation) - Internet traffic analysis breaking encryption - E-recruitment tools automatically pre-selecting/excluding candidates without human intervention	☐ Yes ☒ No ☐ Yes ☒ No ☐ Yes ☒ No ☐ Yes ☒ No
	- Management of personal files - Staff evaluation procedures (annual appraisal) 360° evaluations for helping staff members develop training plans - Staff selection procedures - Establishment of rights upon entry into service - Management of leave, flexitime and telework - Access control systems (non biometric) - Video surveillance (limited scale)	☐ Yes ☒ No ☐ Yes ☒ No ☐ Yes ☒ No ☒ Yes ☐ No ☐ Yes ☒ No ☐ Yes ☒ No ☐ Yes ☒ No ☐ Yes ☒ No

C. Conclusions

	Actor	Date	Signature
28.	Process owner		

Vira Medynska Head of PAT Unit Conclusion Threshold assessment required according to Risk screening		
Data Protection Officer: Tiziana Ciccarone Conclusion I confirm that a threshold assessment is required		

III. THRESHOLD ASSESSMENT OF PERSONAL DATA PROCESSING OPERATION (Article 26 and 39 of Regulation (EU) No. 2018/1725)

This section shall be completed only where a threshold assessment is required, following the outcome of the compliance check and risk screening and in accordance with Articles 26 and 39 of Regulation (EU) 2018/1725.

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A. Criteria for high risks identification

29.	Systematic and extensive evaluation of personal aspects or scoring, including profiling and predicting <i>Example: a bank screening transaction in accordance with applicable law to detect possibly fraudulent transactions; profiling staff based on their transactions in a case management system with automatic reassignment of tasks.</i> <i>Counterexamples: standard appraisal interviews, voluntary 360° evaluations for helping staff to develop training plans.</i>	☐ Yes ☒ No
30.	Automated- decision making with legal or similar significant effect: processing that aims at taking decisions on data subjects <i>Example: automated staff appraisal ('if you're in the lowest 10% of the team for the number of cases dealt with, you'll receive a "unsatisfactory" in your appraisal, no discussion').</i> <i>Counterexample: a news site showing articles in an order based on past visits of the user.</i>	☐ Yes ☒ No
31.	Systematic monitoring : processing used to observe, monitor or control data subjects, especially in publicly accessible spaces. This may cover video-surveillance but also other monitoring, e.g. of staff internet use. <i>Example: covert CCTV, smart CCTV in publicly accessible spaces, data loss prevention tools breaking SSL encryption, tracking movements via location data.</i> <i>Counterexample: open CCTV of garage entry not covering public space.</i>	☐ Yes ☒ No
32.	Sensitive data : data revealing ethnic or racial origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data for identification purposes, data concerning health or sex life or sexual orientation, criminal convictions or offences and related security measures or otherwise considered sensitive.	☒ Yes ☐ No

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	It may occur that applicants disclose potentially sensitive data in their CV/letter of motivation and/or in the course of the interview. These data are not requested by the relevant ETF services for the accomplishment of the relevant administrative procedures. These data (CV) are nevertheless processed in accordance with data protection provisions	
33.	Data processed on a large scale, whether based on number of people concerned and/or amount of data processed about each of them and/or permanence and/or geographical coverage <i>Example: European databases on disease surveillance.</i> <i>Counterexample: invalidity procedures under Article 78 of the Staff Regulations in a medium-sized EUI.</i>	☐ Yes ☒ No
34.	Datasets matched or combined from different data processing operations performed for different purposes and/or by different data controllers in a way that would exceed the reasonable expectations of the data subject. <i>Example: cross-checking access control data and self-declared working hours following a suspicion of fraudulent declarations in an administrative inquiry (following the applicable rules).</i> <i>Counterexample: further use of data processed for a grant application when auditing the grant process.</i>	☐ Yes ☒ No
35.	Data concerning vulnerable data subjects: situations where an imbalance in the relationship between the position of the data subject and the controller can be identified. <i>Examples: children, asylum seekers.</i> <i>Counterexamples: delegates in a Council Working Party (for attendance lists), members of expert groups (for travel cost).</i>	☐ Yes ☒ No
36.	Innovative use or applying technological or organisational solutions that can involve novel forms of data collection and usage. Indeed, the personal and social consequences of the deployment of a new technology may be unknown <i>Examples: machine learning, connected cars, social media screening of job applicants.</i> <i>Counterexample: 1:1 biometric access control using fingerprints.</i>	☐ Yes ☒ No
37.	Preventing data subjects from exercising a right or using a service or a contract. <i>Examples: exclusion databases, credit screening.</i> <i>Counterexample: determination of rights upon entry into service (e.g. expatriation or dependent child allowances).</i>	☐ Yes ☒ No

B. Conclusion

	Actors	Date	Signature
38.	Process owner Vira Medynska Head of PAT Unit Conclusion No further action required Although this process requires the management of sensitive data the risk is low because the management of these data is restricted to the HoU in charge who is bound by strict confidentiality rules. Furthermore, these data are safely stored.		
	Data Protection Officer: Tiziana Ciccarone Conclusion I confirm that no further action is required		

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	Controller Pilvi Torsti, Director of the ETF		
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