

Directorate-General for Personnel  
Directorate for HR Development  
Talent Selection and Outreach Unit



## **Privacy policy**

### **Content:**

- Data Protection Notice: Organisation of competitions and selection procedures
- Data Protection Notice in relation to online testing in competitions and selection procedures organised by the Secretariat of the European Parliament

## Data Protection Notice

### Organisation of competitions and selection procedures

Regulation (EU) 2018/1725 applies to the processing of personal data carried out by the European Parliament.

#### 1) Who processes your personal data?

- The European Parliament, is acting as the Controller<sup>1</sup> and the entity responsible for the processing is European Parliament > Parliament's Secretariat > Directorate-General for Personnel > Directorate for HR Development > Talent Selection and Outreach Unit.
- You can contact the Controller/entity at [PERS-TalentSelection@europarl.europa.eu](mailto:PERS-TalentSelection@europarl.europa.eu)

#### 2) What is the purpose of the processing of your personal data?

Your personal data will be processed to manage the candidates' applications and online tests in the framework of competitions and the different selection procedures organised by the Talent Selection and Outreach Unit.

##### a) Applications portal Apply4EP

This processing requires the use of a software (Gestmax) provided by KioskEmploi / INASOFT (French company). The operations are the following:

- Registration by the candidates, including supporting documents;
- Processing of the applications files at the different steps of the selection procedure;
- Communication with the candidates on the status of their application;
- Assessment of qualifications by the selection board;
- Visualisation of the successful candidates by the recruiting services of the European Parliament.

##### b) Online tests

For the processing of the selection, the Talent Selection and Outreach Unit may organise online proctored tests processed by TestWe (French company).

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<sup>1</sup> A Controller, the public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of the personal data. The Controller is represented by the head of the entity.

3) What is the legal basis for the processing?

The legal basis for the processing is: Articles 27 to 31 and Annex III of the Staff Regulations (for officials), Articles 12 (for temporary agents) and 82 (for contract agents) of the Conditions of employment of other servants; Article 5.1 (a) and (b) of the Regulation (EU) 2018/1725.

4) What personal data is processed?

We process: Your name, surname, gender, date of birth, citizenship, address, email address, phone number, languages, status (if internal competition); Data concerning career including duration of employments and contracts; Data needed in case of request for reimbursement for missions and travel for tests, including bank account and/or other financial data; Opinion of the EP Medical Service in case of disability requiring reasonable accommodation (for instance, additional time for a test). All data concerning the performance of candidates in tests are kept in the Talent Selection and Outreach Unit, and are never forwarded to any other service or unit, other than the competent unit of the EP Legal Service in case of Article 90 Staff Regulations complaints or Court cases.

5) How will your personal data be processed?

- Applications

The processing of online applications for the different selection procedures organised by the Talent Selection and Outreach Unit requires the use of a software (Gestmax) provided by KioskEmploi / INASOFT (French company). All IT servers of the processor are located in Europe. This includes the registration by the candidates, the processing of the application files at the different steps of the selection procedure, the communication with the candidates on the status of their application, the assessment of qualifications and tests by the selection board and the visualisation of the successful candidates by the recruiting services of the EP.

- Online tests

For the processing of the selection, the Talent Selection and Outreach Unit may organise online proctored tests processed by TestWe (French company). All IT servers of the processor are located in Europe with the exception of the server of a TestWe subcontractor for communication purposes (see item 8).

6) For how long will your personal data be stored?

Your personal data will be stored as follows:

- For unsuccessful candidates: 3 years and 6 months from the completion of the selection procedure, on the basis of the candidate's last connection (log-in).
- For successful candidates: until the end of the validity of the list of suitable candidates.
- For spontaneous applications: 3 years following the last connection (log-in).

7) Who are the recipients of your personal data?

The recipients of your personal data are the following:

a) Processor KioskEmploi / INASOFT for online registration;

b) Processor TestWe for online tests;

c) Internal EP services or other EU institutions: interinstitutional collaboration involves data transfers between institutions on specific request. Other interinstitutional transfers are made via EPSO. Data of successful candidates are transferred by the Talent Selection and Outreach Unit to HR and recruitment services of the European Parliament and the EP service responsible for accreditation and security (DG SAFE).

8) Will your personal data be shared with a non-EU country or international organisation?

**Yes**, but only in case of invitation to an online written test run by TestWe: the postal solution being run by a US sub-processor, your email address will be shared with a non-EU country for which there is **no** adequacy decision by the European Commission and the following safeguards apply.

TestWe transfers to its sub-processor Twilio / SendGrid (San Francisco, 375 Beale St #300, San Francisco) the email address of the candidate and the logs (such as email delivery time, opening time, number of clicks). This information is stored for 7 days only on the subcontractor's servers, after which it is permanently deleted.

The terms and conditions of Twilio, which manages the communication, can be consulted by clicking at <https://www.twilio.com/legal/tos>

Twilio's GDPR commitment can be consulted at <https://www.twilio.com/gdpr>

The terms and conditions of the agreement with Sentry (server manager) can be consulted at

[https://sentry.io/terms/?gclid=CjwKCAjwx\\_eiBhBGEiwA15gLN3kSWDPgNx6ajBJ9sdY6qOXLcu\[...\]8&utm\\_content=g&utm\\_medium=cpc&utm\\_source=google&utm\\_term=sentry](https://sentry.io/terms/?gclid=CjwKCAjwx_eiBhBGEiwA15gLN3kSWDPgNx6ajBJ9sdY6qOXLcu[...]8&utm_content=g&utm_medium=cpc&utm_source=google&utm_term=sentry)

9) Are there any automated processes<sup>2</sup> and/or profiling<sup>3</sup> used to make decisions which could affect you?

**No.**

10) What rights do you have?

You have the following rights:

- Right of access to your personal data.
- Right to rectification of your personal data.
- Where applicable - Right to erasure of your personal data.
- Where applicable - Right to restriction of processing.
- Where applicable - Right to data portability.
- Where applicable - Right to object to processing.

You may exercise your rights by contacting the data controller at

[PERS-TalentSelection@europarl.europa.eu](mailto:PERS-TalentSelection@europarl.europa.eu)

**The right to lodge a complaint:**

If you have any remarks or complaints regarding the way that your personal data is processed, you can contact the European Parliament's Data Protection Officer at

[data-protection@europarl.europa.eu](mailto:data-protection@europarl.europa.eu)

You have the right to lodge a complaint with the [European Data Protection Supervisor](#) at [edps@edps.europa.eu](mailto:edps@edps.europa.eu)

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<sup>2</sup> Making a decision solely by automated means and without any human involvement. {Theoretical Examples: internet page where selecting certain options will automatically place you in different mailing lists via which you are sent the corresponding monthly newsletter / using an automated system to mark "Multiple Choice" test answers and assign a pass mark according to the number of correct answers}.

<sup>3</sup> Profiling analyses aspects of an individual's personality, behaviour, interests and habits to make predictions or decisions about them. Used to analyse or predict aspects concerning the data subject's performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements, etc. {Theoretical Example: when using social media tools data is collected and your trends registered. This data is then used to form new/different predictions on you.}

## **Data Protection Notice in relation to online testing in competitions and selection procedures organised by the Secretariat of the European Parliament**

All processing of personal data by the European Parliament is subject to Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 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 (OJ L 295, 21.11.2018, p. 39).

The processing of personal data by the service provider, TestWe, contracted by the European Parliament for the purpose of providing online testing, is also subject to the Regulation (EU) 2018/1725. TestWe must therefore comply with all obligations deriving therefrom. TestWe and its subcontractors carrying out processing activities on behalf of the European Parliament are “processors” in the sense of Article 3(12) of that Regulation.

### **1. Legal basis**

Article 29 of the Staff Regulations (regulating the filling of vacant posts in the European Parliament) and Articles 12 and 82 of the Conditions of Employment of Other Servants of the European Union (respectively regulating the recruitment of temporary staff and contract staff in the European Parliament) form the legal basis for this processing operation.

### **2. Use of your personal data**

- a) Your data will only be processed for the purpose for which it was collected and transmitted.
- b) The service provider, TestWe, is fully GDPR compliant and has a contractual engagement to only process personal data for the purpose of the tests organised.

### **3. Data processed**

- a) The European Parliament and its service provider process the following personal data for the purpose of organising and running online testing:
  - i. first name, last name, email address, phone number, applicant number, selection procedure you are taking part in, the languages of correspondence and in which you have chosen to take the tests, your test answers, details of the operating system and device used for the tests;

- ii. webcam feeds during the tests, including an image of your identity document (ID).
- b) The source of the data processed is:
  - i. the data provided by candidates at the point of application / expression of interest;
  - ii. the data provided during the tests.
- c) Any data provided by candidates regarding the need for reasonable accommodation are not shared by the European Parliament with the service provider. The service provider is only informed of the reasonable accommodation measure(s) that it should implement for the candidates concerned.
- d) Candidates' data are not subject to automated decisions within the processing operation.

#### **4. Data recipients**

The data provided by candidates in the context of taking an online written test via the TestWe platform is only shared with the following receivers:

- a) A limited number of staff (on a 'need to know' basis) of the European Parliament's Talent Selection and Outreach Unit, and Trainee Outreach and Recruitment Unit which are responsible for managing the selection procedure in which the candidate is participating.
- b) The Members of the European Parliament's selection board responsible for evaluating candidates' answers and taking decisions linked to any incidents observed via candidates' webcam images.
- c) A limited number of staff (on a 'need to know' basis) of the service provider, TestWe, in order to organise the tests (including sending invitations to candidates by email, resolving any technical issues reported by candidates during the tests, reviewing webcam images after the tests and processing tests for transmission to the European Parliament's Talent Selection and Outreach Unit).
- d) Candidates' data may be provided to the European Parliament's Legal Service in the event of a complaint or appeals procedure.

Candidates' data is not transferred to any party outside the European Parliament with the exception of candidates' email addresses for communication purposes (see point 6d).

#### **5. Software used to take the test**

- a) In order to ensure that the test conditions and instructions are respected, the TestWe software, that needs to be downloaded in order to take the test, will ask your permission to use administrator rights to lock down your computer during the test. These rights can be reversed as soon as the test has been completed.
- b) The service provider's software does not interact with other software on your computer. No exchange of information or data is made with third party software.

- c) The service provider's software does not take control, in any way, of a candidate's computer to control or operate any other operation or interaction with any other software or application.

## **6. Data security**

- a) TestWe uses servers that are based in Paris, France, where the data must remain.
- b) The servers belong to the company Amazon Web Services (AWS), and meet the highest standards of compliance together with a high level of security. AWS' terms and conditions can be consulted at: [https://aws.amazon.com/service-terms/?nc1=h\\_ls](https://aws.amazon.com/service-terms/?nc1=h_ls)
- c) Personal data stored is encrypted and can only be accessed by TestWe using a secure key that only TestWe possesses.
- d) Your personal data is shared with a non-EU country in the following way: the only data transferred is the candidate's email address and logs (such as time of email delivery, time of opening, number of clicks) for the purpose of sending TestWe emails to candidates. This information is stored for 7 days on the servers of the US-based subcontractor of TestWe, after which the data is permanently deleted.

The terms and conditions of Twilio, which manages the communication, can be consulted by clicking at: <https://www.twilio.com/legal/tos>

Twilio's GDPR commitment can be consulted at: <https://www.twilio.com/gdpr>

The terms and conditions of the agreement with Sentry (server manager) can be consulted at: [https://sentry.io/terms/?qclid=CjwKCAjwx\\_eiBhBGEiwA15gLN3kSWDPgNx6ajBJ9sdY6qOXLcu\[...\]18&utm\\_content=q&utm\\_medium=cpc&utm\\_source=google&utm\\_term=sentry](https://sentry.io/terms/?qclid=CjwKCAjwx_eiBhBGEiwA15gLN3kSWDPgNx6ajBJ9sdY6qOXLcu[...]18&utm_content=q&utm_medium=cpc&utm_source=google&utm_term=sentry)

## **7. Right of access and rectification**

- a) Candidates have the right to rectify, complete, or update their data at any time.
- b) To do so please contact the Talent Selection and Outreach Unit at: [PERS-TalentSelection@europarl.europa.eu](mailto:PERS-TalentSelection@europarl.europa.eu)

## **8. Data retention**

- a) Candidates' data:
  - i. Candidates' answers are downloaded by the Talent Selection and Outreach Unit to EP servers from TestWe after the tests. The Talent Selection and Outreach Unit stores candidates' written answers for a period of 2.5 years (starting from the date when the list of successful candidates is published).
  - ii. TestWe stores candidates' answers for a maximum of 1 year before they are deleted. Candidates' personal data referred to under point 3(a)(i) of this document (above) are stored by the service provider for a maximum of 1 year after the date of the tests, before being deleted.



- b) Candidates' webcam images: Webcam images taken of candidates during the tests, including of their ID document, are stored by TestWe for a maximum of two months and are then deleted.
  - i. In the event that a candidate's webcam images show clear evidence of suspicious behaviour during the test, the candidate's webcam images may be transferred to the European Parliament and stored for 5 years in order to be available should complaints pursuant to Article 90(2) of the Staff Regulations be made.
  - ii. Complaints receiving a negative response in respect of which the person concerned submits an appeal to the General Court (and in some cases, later on, the Court of Justice) remain open until the Parliament has complied with the Court's judgment.

## **9. Data controller**

The data controller is the Head of the Talent Selection and Outreach Unit: [PERS-TalentSelection@europarl.europa.eu](mailto:PERS-TalentSelection@europarl.europa.eu)

## **10. Right to contact the DPO and EDPS**

- a) Data subjects always have the right to contact the European Parliament's Data Protection Officer (DPO) at [data-protection@europarl.europa.eu](mailto:data-protection@europarl.europa.eu)
- b) Data subjects always have the right to lodge a complaint with the European Data Protection Supervisor (EDPS) at [edps@edps.europa.eu](mailto:edps@edps.europa.eu)