



PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data.

Processing operation: *Talent identification and support programmes for Managers*

Data Controller: *Directorate-General "Human Resources and Security" / Unit "Executive Staff" (HR.02)*

Record reference: *DPR-EC-11158*

Table of Contents

- 1. Introduction**
- 2. Why and how do we process your personal data?**
- 3. On what legal ground(s) do we process your personal data?**
- 4. Which personal data do we collect and further process?**
- 5. How long do we keep your personal data?**
- 6. How do we protect and safeguard your personal data?**
- 7. Who has access to your personal data and to whom is it disclosed?**
- 8. What are your rights and how can you exercise them?**
- 9. Contact information**
- 10. Where to find more detailed information?**

1. Introduction

The European Commission (hereafter 'the Commission') is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regards to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reasons for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation "*Talent identification and support programmes for Managers*" undertaken by Unit HR.02 "Executive Staff" is presented below:

2. Why and how do we process your personal data?

In order to deliver its policy goals and its objective to have a more diverse pool of managers, the Commission needs to develop additional processes to identify talents, in order recruit the best and most suitable candidates for its senior management positions. It also needs to ensure that senior managers keep their managerial and leadership skills up-to-date after their nomination. To this end, the Commission collects and uses your personal information in order to identify:

- a) middle managers in the Commission who aspire to become senior managers and who have been identified as potential talent for a senior management function;
- b) established Commission senior managers who possess a clear potential to advance in their career or need further leadership development.

Participants in the talent development programme are manually identified by Unit HR.02 "Executive Staff", either at the request of the participant, by recommendation of the responsible Directorate-General (DG) or by Directorate General of DG Human Resources and Security (DG HR), based on data coming from Sysper and/or their CV and following a discussion with potential candidates on their aspirations, trainings followed, experiences acting as senior manager etc. Candidates identified by Unit HR.02 are invited to enrol in a strand of the programme, based on their profile. A human resource external contractor (Hudson/Randstad) proceeds with the talent development programmes and informs participants on the outcomes (more information at: [Microsoft Word - talent programme online leaflet \(europa.eu\)](https://europa.eu/european-commission/en/management/talent-development-programme)).

Your personal data will not be used for an automated decision-making including profiling.

3. On what legal ground(s) do we process your personal data

We process your personal data pursuant to Article 5(1)(a) of Regulation (EU) 2018/1725 because:

- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body.

The legal bases for such processing are the following:

- Article 24a of the Staff Regulations: "The Union shall facilitate such further training and

instruction for officials as is compatible with the proper functioning of the service and is in accordance with its own interests.";

- Communication to the Commission on the Learning and Development Strategy of the European Commission C(2016)3829;
- The Commission's Talent Management Strategy (2016) (<https://myintracomm.ec.europa.eu/talent-management/Pages/index.aspx>);
- The Commission's HR strategy ([Adoption of the HR Strategy and Greening of the Commission \(europa.eu\)](#)).

4. Which personal data do we collect and further process?

In order to carry out this processing operation, Unit HR.02 collects the following categories of personal data:

- First name,
- Last name,
- Gender,
- Date of Birth,
- Nationality,
- Employment type,
- Grade,
- Directorate General of assignment,
- Type of post of the person,
- Expertise, technical skills and language knowledge,
- Educational background,
- Professional experience,
- Job description,
- Contact details (email, mobile phone, address).

These data are taken either from the data subject's CV or from the personal file in Sysper.

5. How long do we keep your personal data?

Unit HR.02 only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for the pursuit of follow-up actions in relation to the talent development programme for managers, with a maximum of five years.

6. How do we protect and safeguard your personal data?

All personal data in electronic format are stored either on the servers of the European Commission or of its contractors. All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).

The human resource external contractor stores collected data on its servers located in the European Union and guarantees that the necessary data protection and confidentiality measures as required by Regulation (EC) 2018/1725 are in place.

Exchange of electronic data is processed via confidential e-mail. Access to shared drives or functional mailboxes is limited to the authorised staff dealing with the file.

7. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to the Commission staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

1. The Unit HR.02, "Executive Staff" has access to:
 - personal data provided by the data subject in order to be considered for participation in the talent development programme;
 - personal data for data subjects invited by Unit HR.02 to the development programme, based data from Sysper and/or their CV and/or following recommendation of the responsible Directorate General;
 - the aggregated information on participation in the talent development programme provided by the human resource external contractor on a yearly basis.
2. The Secretary-General of the Commission, the Director-General of DG HR, the Permanent Rapporteur for the Consultative Committee on Appointments (CCA), the Members of the Commission as well as members of their private offices have access, upon request, to data available to Unit HR.02 in this process and to the aggregated information based on the participation in the talent development programme.
3. The human resource external consultant carrying out the talent development programmes has access to the personal data provided by the data subject in the context of the talent development programme.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

8. What are your rights and how can you exercise them?

You have specific rights as a ‘data subject’ under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing and the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

You can exercise your rights by contacting the Data Controller, or in case of conflict, the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9, below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10, below) in your request.

9. Contact information

- The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, Unit HR.02 (HR-MAIL-02@ec.europa.eu).

- The Data Protection Officer (DPO) of the Commission

You may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

10. Where to find more detailed information?

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-11158.