



PROTECTION OF YOUR PERSONAL DATA

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

1. Introduction

The European Union Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (hereafter, 'eu-LISA') is committed to protect your personal data and to respect your privacy. eu-LISA 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 regard 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 reason 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

The information in relation to processing operation '*Recruitment - Testing of candidates (Remote Testing Tool)*' undertaken by the Human Resources Unit (HRU) is presented below.

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

The HRU collects and uses candidates' personal information to support the selection and recruitment for different categories of statutory staff (temporary and contract staff) or non-statutory staff (seconded national experts). HRU is making use of an online platform *Testdome* to manage computer-based testing of candidates.

Testdome is a remote testing tool where recruitment staff members create the tests and where the candidates are invited to take the test via a link sent to them by email. The tool makes the process more efficient since the system automatically corrects the tests (in cases of multiple choice) and calculates the total scoring of the candidates.

The candidates perform a written test on the online platform. In order to complete the test, they need to provide their name and e-mail address. No account needs to be created for the candidates. Their name and e-mail are asked before they can start taking the test and this is a one-off procedure that has to be repeated for every different test (in the cases where a candidate has been invited to that phase for more than one selection) and for ensuring the uniqueness of each entry.

Personal data of candidates 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 candidates' personal data, because:

(a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in eu-LISA;

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- Staff Regulations of Officials (SR) and the Conditions of Employment of Other Servants of the European Communities (CEOS), in particular Art. 27-34 (SR) and Arts. 12-15 and 82-84 (CEOS).
- The Recruitment and Selection procedures at eu-LISA shall be done according to the Staff Regulations ('SR') and Conditions of Employment of Other Servants of the European Union ('CEOS'), as well as related implementing rules in order to establish a reserve list and fill in the vacant posts within eu-LISA. The purpose of processing personal data is to enable Recruitment and Selection procedures.

(b) Necessary for the management and functioning of eu-LISA.;

- Decision of Management Board of eu-LISA No 2015-166 laying down general implementing provisions on the procedure governing the engagement and use of temporary agents under Article 2(f) and 56 of the CEOS.
- Decision of Management Board of eu-LISA No 2019-271 for implementing Article 79(2) of CEOS governing the conditions of employment of contract agents employed by the Commission under terms of Article 3a.

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

In order to carry out this processing operation the HRU collects the following categories of personal data:

- Name
- e-mail address
- IP address and browser information
- Information for the evaluation of selection criteria or eligibility criteria: whatever knowledge or expertise might be reflected in your answers
- Answers to knowledge and skills based questions
- Results obtained by the candidates
- Identification number attributed for the purpose of pseudonymous marking of tests
- Languages of testing.

The provision of personal data is mandatory to meet the statutory requirement of testing candidates as part. If a candidate does not provide their personal data, possible consequences are that the candidate might be excluded from further participation in the specific selection procedure.

We have obtained candidates' personal data from the details they have declared and the answers they have provided themselves. IP address of the candidates is obtained from the testing tool.

5. How long do we keep your personal data?

The HRU only keeps candidates' personal data for the time necessary to fulfil the purpose of collection or further processing, namely:

- for applications received but not selected: data is kept for two (2) years after which time they are destroyed;
- for applicants placed on a reserve list but not recruited: data is kept for the period of validity of the reserve list + one (1) year after which time it is destroyed;

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- for recruited applicants: data is kept for a period of ten (10) years as of the termination of employment or as of the last pension payment after which time it is destroyed.

The data retention periods begin at the date of receipt of the application.

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

Access to your personal data is provided to eu-LISA staff responsible for carrying out this processing operation and to authorised staff of the external contractor according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The external service provider authorised staff members could have access to your data according to the "need to know" principle. All of the provider's infrastructure is hosted in Azure West Europe region with data centers in the Netherlands and Ireland. Email, help desk and other communication is stored in the USA, India and Australia and may contain personal information.

According to the providers' privacy statement (<https://www.testdome.com/legal/privacy-policy>), this personal data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for our suppliers or partners. Such staff or subcontractors maybe engaged in, among other things, the fulfilment of controllers' order, the processing of payment details or the provision of support services.

The processor takes all steps reasonably necessary to ensure that personal data is treated securely. In particular, this means that the personal data will only be transferred to a country that provides an adequate level of protection (for example, where the European Commission has determined that a country provides an adequate level of protection) or where the recipient is bound by standard contractual clause according to conditions provided by the European Commission ("EU Model Clauses").

7. 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, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or 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).

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.

8. 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, eu-LISA Human Resources Unit, eulisa-RECRUITMENT@eulisa.europa.eu.

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- **The Data Protection Officer of eu-LISA**

You may contact the Data Protection Officer (dpo@eulisa.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.