



Privacy Statement¹
Information on the protection of your personal data
Management of traineeships – Ref. 082R02

1. Who is responsible for the handling of your personal data at the General Secretariat of the Council (GSC)?

Head of the Staffing and Mobility Unit
staffing.mobility@consilium.europa.eu

2. Contact details of the GSC's Data Protection Officer.

Data Protection Officer
data.protection@consilium.europa.eu

3. What categories of personal data do we handle?

We handle the following categories of personal data:

a) Personal data:

A. SELECTION

- identification data (applicant's/candidate's first and last names, gender, email address, home address, telephone number, citizenship(s), date of birth);
- details of the traineeship: choice of areas or departments of the GSC in which the candidate would like to pursue their traineeship, desired traineeship period;
- filter questions: traineeship already completed in another EU institution or body, completion of first cycle of a course of university studies (yes/no);
- motivational statement;
- employment and traineeship history: education and training, professional experience; knowledge of languages; theses, articles, and publications; IT skills.

¹ Your personal data are handled in accordance with Regulation (EU) 2018/1725.



B. ADMINISTRATIVE MANAGEMENT

The selected candidates must send the following documents to the Traineeships Office:

- a copy of their identity card or passport;
- a copy of diplomas or official certificates; evidence of any professional experience; evidence of knowledge of the languages indicated.

Before the start of and during the traineeship period, other personal data requested or processed in electronic and/or paper format are:

- the data in the application form, and the desired sickness and accident insurance scheme;
- evidence of coverage by other sickness insurance schemes for the duration of the traineeship;
- personal data of the trainee's emergency contact person (name, telephone number, relationship to the contact person);
- personal data included in the legal entity form and financial identity form, including financial data;
- photograph of the trainee;
- address in Belgium;
- type and period of the traineeship;
- the department to which the trainee is assigned and the name of the traineeship adviser;
- requests for leave;
- photographs/recordings from events organised by the GSC;
- trainee's signature in administrative documents;
- administrative identifiers such as 'PER_ID';
- staff number;
- SAP number.

C. EVALUATION

- Report by the traineeship adviser;
- Trainee's report.



The categories of personal data intended for the administrative management and evaluation of traineeships will not be processed via the external service provider (Gestmax software).

Other categories of personal data processed by the external service provider:

- Cookies: the Gestmax application uses two functional cookies hosted by Kioskemploi, the company providing the Gestmax software under licence. One is a session cookie called PHPSESSID that is deleted once the browser is closed. The other one is an authentication cookie, which is used to maintain one's verified status and which stores information for 30 days. IP addresses are not collected.

(a) Special categories of personal data

- Certificate confirming medical aptitude for selected candidates and only after signature of the traineeship agreement.
- Statement on membership of an ethnic group that is underrepresented in the EU Member State: when applying, candidates will have the option of ticking a box to agree with the statement: 'I self-identify with an ethnic group that is underrepresented in the EU Member State of my nationality and differs from its general population in terms of ethnic origin, language, culture or religion'. Candidates will also provide a short motivational statement on ethnic diversity; they will not be asked to provide any documentation supporting their statement.
- Statement from candidates applying for the 'Positive Action Programme for Trainees with a Disability (PAPTD)' scheme. Candidates will have the option of declaring in the application, via a tick box, that they are eligible for participation in the scheme, i.e. they have a disability at the moment of application. To limit further risks, any further information relating to the disability, such as supporting documents or any additional information relating to specific requirements resulting from their disability, will be processed directly by the controller in a secure environment.

Proof of a candidate's disability and any additional information relating to specific requirements resulting from their disability must be provided at the discretion of the candidate if they apply under the PAPTD scheme and if they request measures to be taken by the GSC within the framework of reasonable accommodation of the workplace in the event that they are selected.



- An extract from the criminal record or certificate of good conduct for selected candidates, and only after signature of the traineeship agreement;
- Short motivational statement on ethnic diversity (processed via the Gestmax software);
- The photograph contained in the ID or passport could reveal the racial or ethnic origin of the preselected candidates;
- Other special categories of personal data such as information about sexual life or sexual orientation, political opinions or religious beliefs, etc. could be revealed unintentionally by candidates when completing their application (processed via the Gestmax software). However, the controller does not request those categories of personal data from the candidates.

4. For what purpose do we handle your personal data?

The processing of personal data is carried out to select trainees and manage traineeships at the GSC, including administrative proceedings. For that purpose, the Traineeships Office (TO) uses the GSC's administrative tools (Ariane and Sysper) and an application tool (GestMax).

Description:

In particular, TO processes personal data in order to:

- create a database of applicants wishing to pursue a traineeship at the EU's GSC;
- pre-select candidates for submission to the requesting services;
- conduct the final selection of trainees on the basis of the choices made by the requesting services;
- prepare the traineeship agreement;
- manage administrative matters;
- organise trips and events for trainees;
- carry out satisfaction surveys and/or surveys among trainees to assess and possibly improve on the services provided by the GSC;
- handle reports and prepare certificates for trainees.

TO will also use the services of external service providers. Specifically, TO uses the services of Kioskemploi to provide the e-recruitment application Gestmax under a licensing agreement.



Kioskemploi is not involved in any stage of the decision-making in the context of the recruitment process; rather, it stores applicants' data on the Kioskemploi servers located in France. Gestmax provides a centralised recruitment management system for applicants to create and submit online applications and follow up on the status of their applications.

Further purposes:

TO will use personal data for HR analytics and reporting purposes. This processing is carried out in accordance with Decision 52/2022 on centralised human resources analytics and reporting services at the General Secretariat of the Council and the establishment of a data warehouse.

The data may also be used by the GSC in order to assess eligibility for other types of employment contracts within the GSC and managed by DG HR, and/or to determine eligibility for certain programmes (including the Junior Policy Team Programme).

5. What is the legal basis for the handling of your personal data?

- Article 5(1)(a) of Regulation (EU) 2018/1725: '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'.
- Article 5(1)(d) of Regulation (EU) 2018/1725: 'the data subject has given consent to the processing of his or her personal data for one or more specific purposes': consent will be requested for the transmission of the personal data of selected trainees to the Permanent Representation of the EU member state of which they are a citizen. In addition, consent will be requested for the image rights for taking and distributing photographs of trainees taken at GSC events for communication purposes.
- Article 10(2)(a) of Regulation (EU) 2018/1725 concerning health data: 'the data subject has given explicit consent to the processing of those personal data for one or more specified purposes': consent will be requested for the processing of personal data whenever a candidate requests the provision of reasonable accommodation arrangements. Moreover, consent will be requested for the processing of personal data on ethnic diversity.



- Article 10(2)(b) of Regulation (EU) 2018/1725 concerning health data: ‘the processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law insofar as it is authorised by Union law providing for appropriate safeguards for the fundamental rights and the interests of the data subject’.
- Decision No 57/22 on traineeships in the GSC.
- Decision No 26/23 of the Secretary-General establishing the Junior Policy Team Programme.

6. If the legal basis is consent, you can withdraw it by:

writing to the Head of the Staffing and Mobility Unit, using the address of the Traineeships Office (TO) functional mailbox, and notifying your decision to withdraw your consent to the processing of your personal data.

However, without your data on disabilities, the Diversity and Inclusion Office will no longer be able to handle your request for reasonable accommodation.

7. If the legal basis is a contract, are you obliged to provide us with your personal data and what are the consequences of not doing so?

Not applicable.

8. If we did not receive the personal data directly from you for this purpose, how did we obtain it?

Not applicable.

9. Who are the recipients of your personal data?

Within the GSC:

A limited and defined number of GSC staff and other external actors are involved in handling personal data in traineeship management on a ‘need to know’ basis, namely:

- Staff members in the Traineeships Office, on a ‘need to know’ basis;



- The receiving departments responsible for the selection and management of trainees at the General Secretariat of the Council, on a ‘need to know’ basis;
- If the data subject has indicated in their application that they have a disability or belong to a specific ethnic group, the Diversity and Inclusion Officer;
- In addition, certain administrative details may be disclosed, in compliance with the relevant current legislation and established case law, and on a temporary basis to legislative or supervisory bodies, as well as auditing bodies or courts;
- Staff members of the Organisational Development Unit, on a ‘need to know’ basis – for images/recordings and articles published on DOMUS;
- Staff members from COMM, on a ‘need to know’ basis – for images/recordings published on the GSC’s social media channels;
- Staff members in the recruitment sector of the Staffing and Mobility Unit, involved in the administrative management of the trainees,
- IT staff members with administration rights for the relevant IT tools.

Outside the GSC:

- Limited and authorised staff of the processors: European Commission, travel company, hotels, transport company and sickness and accident insurance company where applicable (for the organisation of trainees’ study visits, etc.).
- The Permanent Representation of the EU member state of which they are a citizen, if the trainee’s consent has been given to share their personal information in order to enable contact with the representatives of the Permanent Representation of that EU member state.
- Designated personnel at Kioskemploi (the company providing the Gestmax software) have access to data stored in Gestmax as administrators of the tool, for technical purposes (for the data in the Gestmax software).
- Only staff of KiosKemploi and Cytadel (Jetpulp), its partner responsible for supervising the server and network infrastructure, are authorised to have remote access to servers and data in connection with the Gestmax software.



- The various European institutions and other international bodies which trainees visit within the framework of their traineeship programme (for example, the Committee of the Regions, the European Economic and Social Committee, the European Parliament, the European Commission, NATO SHAPE or HQ, the Court of Auditors, the Court of Justice and the Council of Europe).

10. Will your personal data be transferred to a third country or an international organisation? If so, what safeguards are in place, if any?

Not applicable.

11. For how long will we keep your personal data?

Data stored on the TO drives/GSC IT tools (e.g. Ariane):

- For unsuccessful applications: data are retained for one year from the date of the end of the traineeship period for which the candidate applied.
- For successful applications: data are retained for two years from the date of the end of the traineeship for which the trainee was selected (including all supporting documents).

Moreover, the following data will be kept for the purpose of issuing administrative certificates, which may be requested by the persons concerned, for a period of five years from the date of the end of the traineeship:

- Copy of the online application (including CV and motivational letter);
- Traineeship agreement (+ possible end of traineeship);
- Confidentiality declaration signed by the trainee
- Traineeship reports (adviser + trainee);
- Traineeship certificate;
- Tax certificate.

Data stored in the tool of the external service provider (Gestmax):

- Data stored in the profile of each candidate in the e-recruitment tool (Gestmax) will be rendered anonymous after one year of user inactivity.



- Logs:
 - Application audits are kept for 52 weeks.
 - Technical logs of the web servers are also kept for 52 weeks, after that they are deleted.
 - Data backups are kept for a period of 32 days.

Special categories of personal data

The following categories of data are stored for two years:

- certificate confirming medical aptitude for selected candidates
- proof of disability and additional information relating to specific requirements resulting from a disability must be provided at the candidate's discretion if they apply under the PAPTD scheme and if they request measures to be taken by the GSC within the framework of reasonable accommodation of the workplace in the event that they are selected
- an extract from the criminal record or certificate of good conduct.

12. Does the handling of your personal data involve automated decision-making, including profiling? What are the consequences for you?

Not applicable.

13. What are your rights² and how can you exercise them?

You have the right of information and the right of access to your personal data.

You also have the right to correct and complete your data.

Under certain circumstances, you may have the right to obtain the erasure of your personal data, or the right to object to the handling of your personal data or to ask for it to be restricted.

You can exercise these rights by sending an email to the person responsible for the handling of your personal data (see point 1), with the Data Protection Officer (see point 2) in copy.

² Articles 17 to 22 of Regulation (EU) 2018/1725.



Together with your request, you must provide a copy of an identification document to confirm your identity (ID card or passport). This document should contain an identification number, country of issue, period of validity, your name, your address and your date of birth. Any other data contained in the copy of the identification document such as a photo or any personal characteristics may be blacked out.

(Not applicable to GSC staff)

14. Could your rights be restricted under Art. 25 of the Regulation (EU) 2018/1725?

Not applicable.

15. You have the right to lodge a complaint with the European Data Protection Supervisor

edps@edps.europa.eu

Before you do so, it is recommended that you first try to obtain a remedy by contacting the person responsible for the handling of your personal data at the GSC (see point 1) and/or the Data Protection Officer (see point 2).
