



EMA/430522/2019

## Record of data processing activity relating to trainings (public)

1.	Last update of this record, version number:	31 December 2019, version 1
2.	Reference number:	A4
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of Administration and Corporate Management Division datacontroller.administration@ema.europa.eu
4.	Name and contact details of DPO:	dataprotection@ema.europa.eu
5.	Name and contact details of joint controller (where applicable)	Not applicable
6.	Name and contact details of processor (where applicable)	Success Factors "Learning Management System" module: Global Account Manager for European Institutions & NATO in SAP Belgium – Luxembourg: Avenue des Olympiades 2 Olympiadenlaan   Bruxelles 1140 Brussel   Belgium, privacy@sap.com Possible external training providers to which EMA staff members may individually enrol for training.
7.	Purpose of the processing	The purpose of processing the training data is to facilitate further training of staff members and to ensure the proper management of the training budget.
8.	Description of categories of persons whose data EMA processes and list of data categories	The following categories of data subjects are subject to this processing operation: <ul style="list-style-type: none"><li>All EMA staff members, interims, and trainees</li></ul> The following categories of personal data are collected for this processing operation: <ul style="list-style-type: none"><li>Basic personal information about the staff member, i.e. surname, first name, office e-mail address, name of line</li></ul>

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		<p>manager job code, hiring date, contractual category, organisational entity to which one belongs;</p> <ul style="list-style-type: none"> <li>Name of the training course, learning objectives and learning plan of staff member, attendance or absence to a course, fee involved for external learning events.</li> </ul>				
9.	Time limit for keeping the data					
		<b>File</b>	<b>Electronic database</b>	<b>Archived in house</b>	<b>Archived off site</b>	<b>Disposal of paper and electronic records after</b>
		Training record	<p>Success Factors LMS module (01/09/2018)</p> <p>SAP LSO (01/01/2013 – 31/08/2018)</p> <p>Records before 2013 in DREAM – Historic training records folder</p>	As long as staff member is in service	No	<p>1 year after staff member's departure</p> <p>Resignation / contract expiry</p>
		Training questionnaires	DREAM (scanned – paper files are not required to store)	2 years	No	2 years
		Training course related material (correspondence, participants list, other related)	DREAM (scanned – paper files are not required to store)	5 years after discharge	No	5 years after discharge
		Training applications (any type)	DREAM	5 years after discharge	No	5 years after discharge

		Language Exams (written exam papers)	DREAM	6 months	3 years	Expiry of off-site period
10.	Recipients of the data	<p>Dedicated staff members within Administration and Corporate Management Division responsible for competency development and training organisation.</p> <p>The engaged data processors as states above.</p> <p>Line managers can see any training undertaken by their staff members.</p>				
11.	Are there any transfers of personal data to third countries or international organisations?	Not applicable				
12.	General description of security measures, where possible.	<p>The Agency has appropriate technical and organisational measures in place, including organisational policies, to safeguard the security of personal data and ensure the confidentiality, integrity and availability of the relevant systems, services and the personal data processed within them. In particular,</p> <ul style="list-style-type: none"> <li>• Paper copies are stored in locked cabinets. Competency Development Office has access right to these records;</li> <li>• Electronic copies can be accessed only through PC password. Competency Development Office has access right to these records;</li> <li>• SuccessFactors is accessed by password, and access is auditable;</li> <li>• Applicants apply through Success Factors LMS module. Production data are stored only within the EU. Up-to-date description of the safeguards are available online: <a href="https://www.successfactors.com/content/ssf-site/en/hr-transformation/cloud-security-data-privacy.html">https://www.successfactors.com/content/ssf-site/en/hr-transformation/cloud-security-data-privacy.html</a>.</li> </ul>				
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	<p>Details concerning the processing of your personal data are available on the Agency's website at: <a href="https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement">https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement</a>, where you may find the EMA General Privacy Statement as well as the privacy statements on specific data processing operations.</p>				