



30 April 2026
EMA/355081/2024

European Medicines Agency's Data Protection Notice For the management of traineeships at EMA

This Data Protection Notice explains the most essential details of the processing of personal data by the European Medicines Agency (hereinafter 'EMA' or 'Agency') in the context of the management of traineeships at EMA.

It is essential to read and retain this data protection notice, together with any other notice we may provide on specific occasions when we are collecting or using personal data about you, so that you are aware of how and why we are using such data and what your rights are under 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 data¹ (hereinafter 'the EUDPR').

1. Who is responsible for processing your data?

1.1. Who is the data controller?

The European Medicines Agency ('EMA') is ultimately responsible to comply with your data protection rights and freedoms. On behalf of EMA, the Head of Administration and Corporate Management Division is appointed as a 'Internal Controller' to ensure lawful conduct of this processing operation. Should you wish to get in touch with the internal controller, please contact datacontroller.administration@ema.europa.eu

1.2. Who are the data processors?

The Agency engages third parties to process personal data on behalf of EMA, more specifically:

¹ 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, pp. 39–98 (link available [here](#))



Processor	Activity	Contact Details
SAP Belgium – Systems, Applications and Products N.V./S.A.	<ul style="list-style-type: none"> • Attraction, recruitment, background checks, contracting and payments, management and administration of recruitment process and onboarding • Management of mandatory training (SAP SuccessFactors modules e.g. Onboarding, Learning); • Operation and Maintenance of EMA’s Human Resource Information System (HRIS) 	Hermeslaan 9, 1831 Diegem-Belgium Privacy@sap.com
TestReach Ltd	Non-automated proctored remote testing	9 - 10 Nexus UCD Belfield Office Park, Clonskeagh D04 V2N9, Dublin 4-Ireland info@testreach.com
SHL Nederland B.V.	Online personality and ability assessments, asynchronous video interviews	Central Park Stadsplateau 29 3521 AZ Utrecht-the Netherlands dpo@shl.com
Microsoft Ireland Operations Limited	MS 365 services and applications to support EMA’s administrative tasks and reporting processes	One Microsoft Place, South County Business Park, Carmanhall and Leopardstown, D18 P521, Dublin-Ireland https://www.microsoft.com/en-us/concern/privacyrequest-msa
Open Text Coöperatief U.A.	Online storage of documents (Electronic Document and Records Management System)	Prof. E.M. Meijerslaan 1, 1183 AV, Amstelveen-the Netherlands DPO@opentext.com
Laboritas B.V.	<ul style="list-style-type: none"> • Establishing disability for the purpose of granting reasonable accommodation or health conditions, upon request of the (prospective) 	Europalaan 16 2408 BG Alphen aan den Rijn-the Netherlands ema@laboritas.nl

	trainee; <ul style="list-style-type: none"> • Justification for health-related absences exceeding 10 calendar days. 	
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2. Purpose of this data processing

The purpose of this data processing activity is the management and processing of documents and information related to trainees, including but not limited to, selection (management of applications at the various stages of this selection), recruitment, onboarding, traineeship files, absences and reasonable accommodation/increased stipend.

We use the relevant personal data of EMA Trainees to:

- support the procedures related to the administrative management of trainees' selection, recruitment, onboarding, traineeship files, absences, issuing traineeship certificates, etc.;
- assign access rights to the buildings and IT systems, as per the traineeship requirements;
- support the financial management procedures and payments of trainees;
- establish disability for the purpose of granting reasonable accommodation in case of disability or health conditions, upon request from the (prospective) trainee;
- invite trainees to events involving them and, if necessary, to fulfil all administrative requirements for their access and participation;
- promote the diversity and accessibility of the traineeship programme - this includes anonymous statistical data;
- provide justification for health-related absences exceeding 10 calendar days;
- create a network of trainees and ex-trainees before and/or after the traineeship;
- establish contact for business continuity purposes;
- generate a list of persons present in the building in the event of a building evacuation;
- generate a report of EMA staff attendance in the building for the purpose of monitoring the effective implementation and compliance with EMA decision on working time and hybrid working;
- send emergency alerts in the event of a crisis situation, disruption to business-critical infrastructure or other emergency event (voluntary).

2.1. Evaluation, automated decision-making or profiling

As a part of the application form, candidates to the traineeships must answer pre-defined pre-screening disqualifying questions. Those questions are based on the eligibility criteria as stated in the

vacancy notice of the traineeship and include pre-defined correct answers. The answers to such questions may be evaluated by automated means. If the candidate's response is negative to one of the disqualification questions, the candidate may be rejected from being admitted to the traineeship selection process.

2.2. Personal data concerned

Personal data collected from you during the traineeship selection process

In this processing operation, the EMA Talent Acquisition team processes data directly collected from you when you submit your initial application form. This may include:

- basic personal information (e.g. surname, first name, gender, nationality, date, place and country of birth) and information to allow the practical organisation of the selection (e.g. address information, telephone, email, etc.);
- information on higher education, professional experience with start and end dates, knowledge of languages, any other studies or publications;
- information on motivations and preferences regarding the type of internship and the field of activity.

Candidates provide personal information on a voluntary basis. However, failure to provide data in the mandatory fields during will not allow the submission of the application form or assessment during the later stages of the selection process.

Moreover, if applicable, the Talent Acquisition Service may also collect other records, which may include results of asynchronous video interviews², online assessments³, results of written/oral custom tests.

In addition, the Talent Acquisition team collects documents uploaded by shortlisted candidates to prove their eligibility. These documents are uploaded by the candidates at the interview stage:

- copy of passport or identity card;
- copy and, if applicable, translation of diplomas, studies and/or Erasmus+ programme declared in the application form.

Personal data collected from you during the traineeship offer and onboarding process

² The asynchronous video interview is a new form of interview in which the applicant is guided through a structured interview process, which they do on their own. In the interview, applicant's answers (text-based) questions in front of their webcam. "Asynchronous" means that interviewee does not do the interview at the same time as the interviewer. The interviewer is not online at the same time as applicant, but instead applicant does the interview independently, at a time and place of their choosing. The hiring manager assesses recorded responses after recording is completed. There is no possibility of downloading interviews from the platform. Candidates invited to asynchronous video interviews receive a specific data protection notice explaining how their personal data is processed in relation to the performance of such interviews.

³ Among others, online assessments may include personality questionnaires, behavioural assessments (e.g. situational judgement), or cognitive ability assessments (e.g. verbal, numerical or abstract reasoning). Candidates invited to online assessments receive a specific data protection notice explaining how their personal data is processed in relation to the performance of such assessments.

The following additional personal information may be collected by the Talent Acquisition Service from candidates who are offered a traineeship:

- Financial Identification Form;
- address and telephone number of the person to be contacted in case of emergency, address during the internship period (if already known);
- phone number for creating a 'next cohort trainees' community; and
- digital photo (for production of access card).

In addition, at the request of the candidates who are offered a traineeship, medical information may be collected by dedicated members of EMA's Occupational Health service and processed by the external Occupational Health Physician (OHP) concerning any disability and/or health condition. This information is used solely to assess the need for reasonable accommodation measures and/or increased stipend.

The EMA's Talent Acquisition team and the Occupational Health service team will only collect the following data from trainees in case of relevant requests to forward them to the external occupational health service:

- full name;
- date of birth;
- private telephone number; and
- private email address.

The OHP will inform the EMA's Health team and Talent Acquisition team only on their opinion on whether reasonable accommodation is required to enable the trainee to carry out the traineeship activities in the most suitable conditions. No medical information will be disclosed to EMA from the external OHP. The mentor and/or manager may need to be informed of the reasonable accommodation as well.

Personal data collected from you during the traineeship

A trainee who may have a disability or health condition that could require reasonable accommodation during the traineeship may request an assessment of their situation. In such case, the collection and processing of personal data will follow the procedure described above.

A trainee may be absent due to health reasons for more than ten (10) consecutive or non-consecutive days.⁴ In such case, the trainee will be requested to provide personal and medical data to the EMA's Occupational Health service team.

The EMA's Occupational Health Service team will first review the medical documentation provided to determine whether it is sufficient to issue an opinion. If the documentation is adequate, the external

⁴ Article 11.6 of the Decision of the Executive Director on the rules governing the traineeship programme at the EMA EMA/116263/2024 (link available [here](#))

OHP will issue an opinion on whether the duration of the sick leave is justified and whether additional absence beyond ten (10) days is medically necessary. If the documentation is not sufficient, the EMA Occupational Health Service team will request an appointment with the external OHP to complete the assessment.

The Talent Acquisition Service team and the Occupational Health Service team will facilitate the scheduling of any required appointment with the OHP. After the assessment is completed, the trainee will be informed of the OHP's opinion. No medical details will be disclosed to services outside the Occupational Health Service team.

A trainee may be absent due to several non-health related reasons.⁵ In such cases, the trainee will provide the relevant proof of absence to the Talent Acquisition Service.

Additional personal data may be provided, based on your consent (e.g., testimonials, group or individual videos and/or photos or other materials for promotion of the EMA traineeship). Trainees will be informed of their rights and the details of the processing of these data ahead of such activities.

2.3. Legal basis of the processing

The processing of personal data in relation to the traineeships at EMA is necessary for the management and functioning of the Agency (Recital 22 of EUDPR) and the performance of its tasks in the public interest on the basis of Article 5(1)(a) of EUDPR.

Please note that when the processing is based on public interest you have the **right to object** as explained in Section 5 below.

In addition, this data processing activity is necessary for the management and functioning of the Agency, as well as the performance of the Agency tasks carried out in the public interest as required by Regulation (EC) No 726/2004⁶, on the establishment of EMA in combination with Regulation 2018/1718⁷ on the location of the seat of EMA, Directive 2001/83/EC⁸ and Regulations 2019/5⁹, 2019/6¹⁰ on EMA's role in the authorisation of medicinal products and other applicable Union legislation.

Regarding special accommodation and health-related absences exceeding 10 days where you share special categories of personal data with EMA concerning your health, i.e. information concerning disability and/or health problems, the processing is necessary for the purposes of fulfilling the

⁵ Article 11.3 of the [Decision of the Executive Director on the rules governing the traineeship programme at the EMA](#)

⁶ Regulation (EC) No 726/2004 of the European Parliament and of the Council of 31 March 2004 laying down Community procedures for the authorisation and supervision of medicinal products for human and veterinary use and establishing a European Medicines Agency, OJ L 136 30.4.2004, p. 1 (link available [here](#))

⁷ Regulation (EU) 2018/1718 of the European Parliament and of the Council of 14 November 2018 amending Regulation (EC) No 726/2004 as regards the location of the seat of the European Medicines Agency, OJ L 291, 16.11.2018, pp. 3–4 (link available [here](#))

⁸ Directive 2001/83/EC of the European Parliament and of the Council of 6 November 2001 on the Community code relating to medicinal products for human use, OJ L 311 28.11.2001, p. 67 (link available [here](#))

⁹ Regulation (EU) 2019/5 of the European Parliament and of the Council of 11 December 2018 amending Regulation (EC) No 726/2004 laying down Community procedures for the authorisation and supervision of medicinal products for human and veterinary use and establishing a European Medicines Agency, Regulation (EC) No 1901/2006 on medicinal products for paediatric use and Directive 2001/83/EC on the Community code relating to medicinal products for human use, OJ L 4, 7.1.2019, pp. 24–42 (link available [here](#))

¹⁰ Regulation (EU) 2019/6 of the European Parliament and of the Council of 11 December 2018 on veterinary medicinal products and repealing Directive 2001/82/EC, OJ L 4, pp. 43–167 (link available [here](#))

obligations and exercising the rights of the controller or the data subject in matters of employment law, social security, and social protection according to Article 10(2)(b) EUDPR.

Further, the processing operations are necessary to fulfil the obligations laid down under the Decision of the Executive Director on the rules governing the traineeship programme at the EMA.¹¹

For those activities where participation is voluntary (e.g., testimonials, group or individual videos and/or photos or other materials for promotion of the EMA traineeship), the processing of this personal data will be based on Article 5(1)(d) EUDPR, i.e., consent. In this regard, additional information regarding the processing and your rights is provided at an appropriate time prior to the processing. In this regard, you have the right to withdraw consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

2.4. Transfer of personal data outside the EU

If applicable, any transfer of data to a third country or an international organisation by the Agency's processors shall be done only on the basis of documented instructions from the Agency or in order to fulfil a specific requirement under Union or Member State law to which the processors are subject and shall take place in compliance with Chapter V of Regulation (EU) 2016/679¹² or the EUDPR.

3. How long do we keep your data?

At EMA, we process the minimum amount of personal data necessary for the above-mentioned purposes. Upon completion of the retention period, we will securely dispose of your personal data following the applicable legislation.

Type of data	Retention Period
Candidates that created the profile but did not submit any application	1 year from the date of the profile creation
CVs of successful candidates	8 years from the end of the calendar year in which the traineeship was completed or until the end of a monitoring, audit or inspection (whichever is the latest)
CVs of unsuccessful candidates	Deleted after the end of traineeship period the candidate applied for
Declaration of Interest	2 years from date of departure from the Agency (acceptance of employment); ¹³

¹¹ [Decision of the Executive Director on the rules governing the traineeship programme at the EMA](#)

¹² Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), link available [here](#).

¹³ Decision of the European Medicines Agency on rules relating to Articles 11, 11a and 13 of the Staff Regulations concerning the handling of declared interests of staff members of the European Medicines Agency and candidates before recruitment EMA/MB/259494/2016, Rev. 7 (link available [here](#)), in combination with Decision of the Executive Director on

	1 month from candidates' notification to the Agency that s/he will not take up the offer of employment or the Agency withdraws its employment offer ¹⁴
Confidentiality undertaking	5 years from the date on which the European Parliament gives discharge for the financial year to which the documents relate or until the end of a monitoring, audit or inspection (whichever is the latest)
Video recordings of the non-automated proctored remote testing	6 weeks after the exam or until the settlement of an appeal process
Successful candidates: <ul style="list-style-type: none"> ○ candidate application form, including all annexes (copies of diplomas and certificates, copy of passport). ○ EMA's offer for traineeship ○ copy of the training diploma issued to the trainee at the end of the traineeship ○ correspondence attesting to the early termination of the traineeship (if applicable); ○ traineeship statements containing information such as surname, first name, middle name, date of birth, period of the traineeship, branch/department in which the trainee worked, and amount of grant received. 	8 years from the end of the calendar year in which the traineeship was completed or until the end of a monitoring, audit or inspection (whichever is the latest)
Medical certificates submitted for the external medical provider to justify reasonable accommodation and/or absence due to health reasons of more than 10 days	Deleted directly after the assessment has been completed. No medical file is created.
Other certificates justifying absences (for example, attendance to job interview, attendance to official exam etc)	Deleted directly after verification of the reason
Trainees' photos, videos, and testimonials	According to the relevant Data Protection Notice publishing testimonials on the career's portal ¹⁵ or

rules concerning the handling of declared interests of national experts on secondment, trainees, interims, visiting and collaborating experts of the European Medicines Agency EMA/20311/2025 (link available [here](#))

¹⁴ Ibid.

¹⁵ European Medicines Agency's Privacy Statement for publishing testimonials on the career's portal, EMA/274113/2020, available internally.

any other Data Protection Notice related to the processing activity

Note: Creating a candidate profile allows you to apply to multiple selection procedures without the need to re-enter your details each time. However, you can completely delete your profile by yourself (preferable) or by contacting EMA recruitment@ema.europa.eu

As a result, your profile and personal data will be permanently deleted from any successful and unsuccessful job application for which you have applied.

4. Who has access to your information and to whom is it disclosed?

The data listed in Section 2.2 of this Data Protection Notice as '*Personal data collected from you during the traineeship selection process*' may be shared internally and on a need-to-know basis with:

- the hiring manager and members from the EMA business team the trainee will join.

The data listed in Section 2.2 of this Data Protection Notice as '*Personal data collected from you during the traineeship offer and onboarding process*' and '*Personal data collected from you during the traineeship*' may be shared internally and on a need-to-know basis with:

- dedicated staff from operational organisational entities managing trainees' matters, including Talent Acquisition, Staff Matters, Talent Development, IT and Facilities;
- dedicated staff members from the Strategic Planning and Budget team and the Human Resources Business Partners for resource allocation management and for creation of reports for strategic planning and budgeting (restricted information on names and functions);
- the Executive Director and Assistants to Executive Director, the Deputy Executive Director, the Internal Audit Service, the Legal Department, the Data Protection Officer (DPO).

Furthermore, we may share your personal data contained in your personal file with the following external institutions, on a need-to-know-basis or when the Agency is required to do so by law, including for monitoring, auditing or inspection purposes in accordance with European Union law:

- the European Ombudsman;
- the Court of Justice of the EU;
- the European Court of Auditors;
- the European Anti-Fraud Office (OLAF);
- the European Public Prosecutor's Office (EPPO); and
- the European Data Protection Supervisor (EDPS).

Information related to processing reasonable accommodation, increased stipend or management of absences due to sickness will be processed by:

- dedicated staff members from the Talent Acquisition Service and Occupational Health Service teams. The second will only receive the request for reasonable accommodation by trainees to forward it to
- the external Occupational Health Service and the nominated Occupational Health Physician.

These two categories above will not maintain any information after the OHP assessment is created. No medical file is created by any of them.

- EMA staff members working in the Administration and Corporate Management Division or Information Management Division, may access information about work limitations due to a disability, if applicable, to facilitate the access to budget/material that may be needed to fulfil the reasonable accommodation.
- The mentor and/or line manager of the trainee initiating the request about work limitations due to disability or health condition, if applicable.

5. Your data protection rights

As a data subject (i.e. the individual whose personal data is processed), you have several rights:

- **Right to be informed**—This Data Protection Notice provides information on how EMA collects and uses your personal data. Requests for other information regarding processing may also be directed to the Internal Controller.
- **Right to object** – You have the right to object at any time to this processing on grounds related to your particular situation. If you do so, EMA may only continue processing your personal data if it demonstrates overriding legitimate grounds to do so or if this is necessary for the establishment, exercise or defence of legal claims.
- **Right to access** – You can access your personal data. You have the right to request and obtain a copy of the personal data processed by EMA.
- **Right to rectification** – You have the right to obtain - without undue delay - the rectification or completion of your personal if it is incorrect or incomplete.
- **Right to withdraw consent (only for voluntary activities)** – You can withdraw your consent to processing your personal data. However, this will not affect the lawfulness of any processing before consent is withdrawn. Your data will be used for automated decision-making when determining the eligibility of your application for the EMA's traineeship programme.

In case of objection, your registration for EMA's traineeship programme cannot be considered.

- **Right to erasure**—You have the right to require EMA to delete or stop processing your data, for example, where the data is no longer necessary for processing. In certain cases, your data may be kept to the extent necessary, for example, to comply with a legal obligation of the Agency or if it is necessary for reasons of public interest in public health.
- **Right to restrict processing** – In a few codified cases, you have the right to obtain the restriction of the processing, meaning that your data will only be stored but not actively processed for a limited period. For more information about this right and its limitations, see the general EMA Data Protection and Privacy policy, hosted at www.ema.europa.eu/en/about-us/legal/privacy-statement.
- **Right to portability** - Where the processing is carried out based on your consent and in automated means, you can receive your personal data (provided to the EMA directly) in a machine-readable format. You may also ask the EMA to transfer such data to another controller directly.

The data subject's rights can be exercised under EUDPR. For anything that is not explicitly provided for in this Data Protection Notice, please refer to the contents of the general EMA Data Protection and Privacy policy: [Data protection and privacy at EMA | European Medicines Agency \(EMA\)](#)

6. Recourse

If you have any questions regarding the processing of your personal data, think that the processing is unlawful, or you think that it is not in compliance with this Data Protection Notice or the general EMA Data Protection and Privacy policy, please contact

the **Internal Controller** at datacontroller.administration@ema.europa.eu

or the **EMA Data Protection Officer** at dataprotection@ema.europa.eu

Address	Postal Address	EMA Switch Board
European Medicines Agency Domenico Scarlattilaan 6 1083 HS Amsterdam The Netherlands	European Medicines Agency PO Box 71010 1008 BA Amsterdam The Netherlands	+31 (0)88 781 6000

You also have the right to complain to the **European Data Protection Supervisor (EDPS)** at any time at the following address:

- Email: edps@edps.europa.eu
- Website: www.edps.europa.eu
- Further contact information: [Contact Us | European Data Protection Supervisor](#)