



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

EMA/208341/2019

Record of data processing activity in the context of Selection and Recruitment procedures (Public)

1.	Last update of this record, version number:	23 May 2025, version 4
2.	Reference number:	A3
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)	N/A
6.	Name and contact details of processor (where applicable)	<u>For e-recruitment module for online job application:</u> SuccessFactors privacy@sap.com <u>Non-automated proctored remote testing</u> TestReach Ltd info@testreach.com <u>Assessment Centres:</u> Hudson Belgium NV be.privacy@hudson.com Mercer Italia Srl privacy@mmc.com Price Waterhouse Coopers DE_Kontakt@pwc.com <u>Online personality and ability assessments, asynchronous video interviews</u> SHL dpo@shl.com <u>Active sourcing of passive candidate</u> The Boston Consulting Group BV/SRL, Belgium, DataProtectionOffice@bcg.com

Official address Domenico Scarlattilaan 6 • 1083 HS Amsterdam • The Netherlands

Address for visits and deliveries Refer to www.ema.europa.eu/how-to-find-us

Send us a question Go to www.ema.europa.eu/contact **Telephone** +31 (0)88 781 6000

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7.	Purpose of the processing	The purpose of this data processing activity is the selection and recruitment of EMA's staff in the context of performing of the Agency tasks, including: • Enabling the organisation of selection and recruitment procedures to recruit temporary agents, contract agents, seconded national experts, collaborating experts and trainees. This processing includes assessing your skills, qualifications, and suitability for the position within EMA, communicating with you about the recruitment process, keeping updated records related to our recruitment processes; • Ensuring the management of applications at the various stages of these selections and recruitments; • Ensuring the management and control of the use of reserve lists/talent pools; • Responding to your queries by the Talent Acquisition Service ("TAS") regarding your personal data used to create a candidate profile in the e-recruitment system; • Complying with legal or regulatory obligation and requirements as laid down by EU law, including Regulation (EC) 726/2004² and Staff Regulations of Officials (SR) and the Conditions of Employment of Other Servants of the European Communities (CEOS)³, the applicable Implementing Rules for Temporary Agents and Contract Agents, relevant (annual) Decision of the Executive Director on rules governing the secondment of national experts to the EMA and relevant (annual) Decision of the Executive Director on rules governing the traineeship programme at the EMA. EMA is striving to further diversify its candidate sources by actively sourcing passive candidates and attracting candidates who are not actively searching for the job but could be attracted to the Agency's mission and qualified for its roles. The processor for this active sourcing is expected to: • Approach passive eligible and qualified candidates on behalf of the EMA; • Explain the vacancy and the application process; • Guide sourced candidates to the EMA online job application system; • Follow up with the candidates; • Deliver a list of the sourced candidates to EMA.
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8.	Description of categories of persons whose data EMA processes and list of data categories	Categories of persons whose data EMA processes: All internal or external candidates applying for open vacancies at EMA. Types of data processed: • Basic personal information about the candidate, i.e. surname, first name, date of birth, gender; • Contact details and information provided by the candidate to allow the practical organisation of selection and recruitment, e.g. address information: street, postcode, town, country, telephone, fax, e-mail; • Information provided by the candidate to verify whether he/she fulfils the eligibility and assessment criteria laid down in the vacancy notice, e.g. information about nationality, languages, education, previous working experience, fulfilment of military/civil service duties, health information, criminal convictions, relatives working at EMA etc. • If applicable, EMA may also collect records of the pre-selection or results of written/oral tests and documents from selected candidates to demonstrate the claimed information, experience and skills, such as (but not limited to) a copy of passport or identity card and academic qualifications. • Should you choose to provide information about your racial, national, or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation as set out in Article 10 EUDPR (also referred to as special categories of personal data), such information will be used to ensure meaningful equal opportunity monitoring and reporting and for statistical purposes. Information about your health and disability status will be used to provide appropriate adjustments during the recruitment process. • EMA may collect personal data directly from candidates as well as from information sources that are publicly available, such as social media or other publicly available websites. • EMA may also use the data in a fully anonymised format for testing and development purposes of the SuccessFactors platform. The service provider of the active sourcing of passive candidates may collect the following data: • Name and Surname (collected via LinkedIn) – shared with EMA through an excel list • Location (collected via LinkedIn) – used in anonymised reporting shared with EMA • Gender (collected via LinkedIn) – used in anonymised reporting shared with EMA • Phone number & email (provided by candidate) – only used to conduct calls with candidates, screen candidates
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		and answer candidate questions; information is not shared with EMA		
9.	Time limit for keeping the data		Disposal of paper and electronic records	
		Applications and Candidate profiles in SuccessFactors e-recruitment	Successful candidates	Unsuccessful candidates
		Temporary Agents and Contract Agents	5 years after expiry of the reserve list (including any extensions)	2 years from the last communication
		Seconded National Experts	3 years from the application date	1 year from the last communication
		Visiting/Collaborating Experts	8 years from the application date	6 months from the last communication
		Experts	8 years from the application date	6 months from the last communication
		Trainees	8 years from the application date	1 year from the last communication
		Interims	8 years from the application date	6 months from the last communication
		Candidates' Declaration of Interest	1 month after candidate has informed the Agency of not joining anymore. Otherwise, kept in personal file and personal file retention period applies	N/A
		Police Certificate/Criminal Record or similar documents on Personal Files (AT/CA/SNE)	2 years following recruitment and destroyed confidentially	N/A
		Video recordings of the non-automated proctored remote testing	6 weeks after the exam or until the settlement of an appeal process	
		Candidates that created a profile but never applied	1 year from the date of the profile creation	
		General candidate/recruitment queries relating to recruitment or selection procedures not necessarily specific to one selection procedure	2 years from date of query	
		Data stored by EMA's service provider for sourcing of passive candidates	The service provider retains the data for the duration of its contract with EMA and deletes them upon expiration of the contract, or, at the latest, no longer than 5 years from the date of collection.	

10.	Recipients of the data	The EMA may share your personal data with the following internal departments and services, insofar as it is strictly necessary for them to perform their tasks: • Staff Relations and Support Department; • Members of the Selection Committee; • Appointing Authority (Executive Director); • If appropriate, access will be given to the Internal Audit Service, the European Ombudsman, the Civil Service Tribunal and the European Data Protection Supervisor, the European Court of Auditors. Should your name be placed on a reserve list, and as a result, your candidature becomes part of the talent Pool, access to the relevant talent pool or reserve list(s) and to the applicant's personal data (including the application form) shall be provided, in the context of an ongoing recruitment procedure, • to the concerned internal services interested in the recruitment of you as a successful candidate, • the Human Resources Business Partners (HRBP) advising the concerned internal services interested in the recruitment of the candidate. When a candidate is identified to fill a recruitment, access to the talent pool/reserve list(s), will be revoked at the day of the final acceptance of the offer by the selected candidate. Selection reports and similar documentation should be preserved in line with the EMA retention policies contained in Internal Guidance/no: 0033-2023. Access to the search functionalities to fulfil access requests from data subjects is granted exclusively to TAS staff members. In case the Agency outsources services to third parties (see section 1.2), such as, but not limited to, selection providers or test administrators, personal data of the candidates may be shared with them to organise the procedure.
12.	General description of security measures, where possible.	Paper copies are stored in locked cabinets. Electronic copies can be accessed only through PC password. SuccessFactors is accessed by password, and access is auditable. Applicants apply through Success Factors e-recruitment module. Production data are stored only within the EU. In all cases in which data are supposed to be provided in anonymised form, no additional information that may enable the identification of data subjects should be made available to the recipients of the anonymised data. Up-to-date description of the safeguards are available online: https://www.successfactors.com/content/ssf-site/en/hr-transformation/cloud-security-data-privacy.html
13.	For more information, including how to exercise your rights to access, rectification, object and	Details concerning the processing of your personal data are available on the Agency's public website: Data Protection and Privacy at EMA

	data portability (where applicable), see the privacy statement:	and in the specific Data Protection Notice for Selection and Recruitment: EMA-A-003-DPN-selection and recruitment-Public
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