



20 February 2026
EMA/48970/2026

Records of data processing activity relating to temporary agency workers (interims)

1.	Last update of this record, version number:	20 February 2026, version 1		
2.	Reference number:	EMA-A-048		
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of Administration and Corporate Management Division of EMA Contact: 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 processors (where applicable)	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 payrolling, management and administration of recruitment process, onboarding and time management (SAP Fieldglass);Management of mandatory training (SAP SuccessFactors modules e.g. Onboarding, Learning);	Hermeslaan 9, 1831 Diegem-Belgium Privacy@sap.com



		<ul style="list-style-type: none"> • Operation and Maintenance of EMA's Human Resource Information System (HRIS) 	
		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
7.	Purpose of the processing	<p>To ensure business continuity and to provide temporary solutions for critical staff requirements at EMA such as long-term absence and peak periods requiring additional workforce, framework contracts have been concluded to recruit and engage interims via temporary worker agencies for administrative and technical tasks. Interims will perform the tasks defined in the vacancy announcement during each assignment. EMA employs interims temporarily on short-term contracts exclusively through temporary worker agencies.</p> <p>This data processing activity's purpose is to determine the competences and alignment of the candidates with the position, select interim workforce and manage their work at the Agency, including, but not limited to selection, onboarding, verification of invoices and hours worked, departures, and storage of personal files.</p> <p>Personal data are also processed to enable efficient talent management, including mandatory induction and job-specific training, leave administration, desk allocation, labour relations improvement, and health and safety, as well as budget monitoring and resource allocation.</p>	
8.	Description of categories of persons whose data EMA processes and list of data categories	<p>The following categories of data subject are subject to this processing operation: • Interims.</p> <p>The following categories of personal data are collected for this processing operation:</p> <p>Personal data collected from the temporary worker agency</p> <ul style="list-style-type: none"> • Basic personal data allowing identification of the candidate: surname, first name; • Curriculum Vitae of candidates for an interim position are uploaded by the temporary worker agency into SAP Fieldglass (i.e. the human resource management tool used by the Agency). EMA does not require a specific format for CVs, so they can include personal data not required by EMA, such as birth date, gender, nationality, address, etc. In addition to the CV, the temporary worker agency may provide further information regarding each interim candidate to allow verification of the selection criteria as 	

		<p>stated in the vacancy announcement, such as professional experience and availability to start;</p> <ul style="list-style-type: none"> • A private telephone number and a private email address to organise interviews with the candidates; • Declaration of Interest of all candidate interims; • Monthly invoices issued by the interim agency, which are related to each interim worker (including name and hours of work performed); • The payment working files and other files referring to the interims, which are used for validating the invoices received from the temporary work agency. These include excel reports from SAP Fieldglass and relevant SAP modules; • An individual security ID to log on to the Contingent workforce management tool (SAP Fieldglass). <p>Data relating to criminal convictions and offences is requested from you and checked by the temporary worker agency, and EMA is only informed of the outcome of the evaluation of such data, i.e., whether or not the engagement of the candidate at EMA is prevented.</p> <p>Personal data collected from you during your engagement at EMA</p> <ul style="list-style-type: none"> • Name, surname and function to be added by you in the Declaration of Interest to the EMA system (SAP HRIS), and in the Confidentiality Undertaking and the Interim Assignment Declaration Form (both in SAP Fieldglass); • Absences and working time entries in a form with your name, surname, the organisational entity you work for, the cost center to which you belong and the hours effectively worked each week. These forms are completed directly in the contingent workforce tool (SAP Fieldglass); • Other personal information voluntarily added by you to different SAP SuccessFactors modules, including competencies, talent profile including but not limited to work experience, special assignments, education & training, learning history, language skills, external training requests, talent skills, career aspirations, performance history; • Information about the data collected from EMA staff members, including interims, through other companies contain the operation of the Agency's Security Access Control System, and the emergency mass notification system (voluntary). 	
9.	Time limit for keeping the data	Type of data	Retention Period
		CVs of successful candidates	8 years from the end of the calendar year in which the service ceased or until the end of a monitoring, audit or inspection

		CVs of unsuccessful candidates	Deleted upon onboarding of the successful candidate(s)
		Personal files (payment working files) and files used for validating the invoices together with the invoices and emails received by the vendors	8 years from the end of the calendar year in which the service ceased or until the end of a monitoring, audit or inspection
		Declaration of Interest	2 years from date of departure from the Agency (acceptance of employment); 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
		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
		Interim Assignment Declaration Form	
		Personal data collected from interims during their engagement at EMA	According to the relevant internal retention period for each document type. For a complete list of the retention periods applicable to interims engaged at EMA, please see the document ' <i>Internal guidance for archiving and disposal of documents in HR Rules, Procedures and Partnerships, Staff Matters and Talent Acquisition services</i> '
10.	Recipients of the data	<p>The data listed '<i>Personal data collected from you during your engagement at EMA</i>' will be shared internally and on a need-to-know basis with:</p> <ul style="list-style-type: none"> • the direct line manager and the members of the team, for which you are hired as an interim; • dedicated staff members from operational organisational entities of the Administration and Corporate Management Division managing interims' matters, including talent acquisition, rules, procedures and partnerships, facilities; • dedicated staff members from other organisational entities managing financial and budgetary obligations including the financial verifying agent, the financial initiating agent, the authorising officer, the accounting officer; • dedicated staff members from the Accounts Payable team of the accounting department (restricted information of the number of hours worked, the amount to be paid and the vendor only); • 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); 	

		<ul style="list-style-type: none"> the Executive Director and Assistants to Executive Director, the Deputy Executive Director, the Internal Audit Service, the Legal Department, the Data Protection Officer (DPO). <p>Requests for access to documents under the provisions of Regulation 1049/2001 are handled under EMA's relevant Privacy Statement concerning requests for information or access to documents.</p> <p>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:</p> <ul style="list-style-type: none"> 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) the European Data Protection Supervisor (EDPS).
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	N/A
12.	General description of security measures, where possible.	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, access rights to the contingent workforce management system users are granted only to dedicated EMA staff members handling interims' matters. The access to those modules is protected with personal password.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the relevant Data	<p>Details concerning the processing of your personal data are available on the Agency's website at:</p> <p>https://www.ema.europa.eu/en/about-us/data-protection-privacy-ema</p> <p>Here you may find the data protection notice regarding this specific data processing operation:</p> <p>EMA-A-048-DPN-Interims-Public</p>

	Protection Notice:	
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