



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

22 May 2025
EMA/208342/2019
Administration and Corporate Management Division

European Medicines Agency's Data Protection Notice For Selection and Recruitment

The European Medicines Agency (hereinafter "EMA" or "Agency") is committed to respecting the privacy of its candidates for recruitment. Within the framework of the staff selection and recruitment procedures at EMA, the Agency processes the personal data contained in its e-recruitment portal, and data provided by candidates outside of it, in accordance with the 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").

This statement explains how the EMA collects and uses the personal data provided by candidates within the different stages of the staff selection and recruitment procedures.

1. Who is responsible for your data?

1.1. *Who is the data controller?*

The EMA represented by its Executive Director is responsible as the data controller to ensure compliance regarding your data protection rights and freedoms according to the EUDPR and internal procedures. Internally, the Head of Administration and Corporate Management Division has been appointed to act as "Internal Controller" to ensure the lawful conduct of this processing operation.

You may contact the Internal Controller via the following email address;
datacontroller.administration@ema.europa.eu

1.2. *Who is the data processor?*

The Agency may engage third parties to process data on its behalf and, in particular, to carry out the following activities: online job applications, proctored remote testing, online personality and ability assessments, asynchronous video interviews, Assessment Centres.

The contact details of the data processor(s) are the following:

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 (link available [here](#)) i.e., the European Union Data Protection Regulation (EUDPR)



Activity	Provider	Contact
Online job application	SuccessFactors Amerikastraat 10 5232 BE 's-Hertogenbosch-the Netherlands	privacy@sap.com
Non-automated proctored remote testing	TestReach Ltd 9 - 10 Nexus UCD Belfield Office Park Clonskeagh D04 V2N9 Dublin 4-Ireland	info@testreach.com
Assessment Centres	Hudson Belgium NV Bourgetlaan 42 1130 Brussels-Belgium	Be-privacy@Hudsonsolutions.com
	Mercer Italia Srl Viale Bodio Luigi 33 20158 Milano-Italy	privacy@mmc.com
	PricewaterhouseCoopers GmbH Wirtschaftsprüfungsgesellschaft Friedrich-Ebert-Anlage 35-37 60327 Frankfurt am Main-Germany	DE_Kontakt@pwc.com
Online personality and ability assessments, asynchronous video interviews	SHL Central Park Stadsplateau 29 3521 AZ Utrecht-the Netherlands OR 7 Rue De Madrid 75008 Paris-France	dpo@shl.com
Active sourcing of passive candidate	The Boston Consulting Group BV/SRL, Belgium Keizerinlaan 13 / Boulevard de l'Impératrice 13, 1000 Brussels-Belgium	DataProtectionOffice@bcg.com

2. Purpose of this data 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.

2.1. *Personal data concerned*

We collect personal data directly from you as a candidate when you apply for open vacancies at EMA. Candidates are free to provide personal information on a voluntary basis, although failure to provide data in the mandatory fields will not allow the submission of the application form or assessment in the later stages of the selection process.

The personal data processed are the ones provided in the form used for the electronic application, in particular:

- Basic personal information about the candidate, e.g. 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 you to verify whether you as a candidate fulfil 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.

² 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 (link available [here](#))

³ Regulation No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community (link available [here](#))

Moreover, if applicable, EMA may also collect other records, such as results of asynchronous video interviews⁴, various online assessments⁵, results of written/oral custom tests delivered in person or remotely, 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 proof of academic qualifications and work experience.

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), we will use such information to ensure meaningful equal opportunity monitoring and reporting and for statistical purposes. We will also use information about your health and disability status to provide appropriate adjustments during the recruitment process.

EMA may also use the data in an anonymised format for testing and development purposes of the SuccessFactors platform. For this purpose, the data are being anonymised by internal EMA system administrators who otherwise support this data processing activity from an information management point of view.

EMA may collect personal data directly from you as a candidate as well as from information sources that are publicly available, such as social media or other publicly available websites. In relation to the sourcing of passive candidates, the EMA's processor 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 and answer candidate questions; the information is not shared with EMA.

2.2. Legal Basis

We process your personal data based on your consent provided directly when registering to the e-recruitment system (Article 5(1)(d) EUDPR). Please see in the Annex the statements that candidates are asked to confirm when registering to the e-recruitment system Jobs@EMA.

In addition, the selection and recruitment procedures are necessary for the management and functioning of the Agency (Article 5(1)(a) EUDPR). The processing of data is necessary for the performance of tasks carried out in the public interest and in the exercise of official authority vested in the Union institution or body as provided for under:

⁴ 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. Selection Committee 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.

⁵ Among others, online assessments may include personality questionnaires, behavioural assessments (e.g. situational judgement), job focused assessments (e.g. PM knowledge, secretarial skills, MS Office), 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.

- Regulation (EC) 726/2004 of the European Parliament and of the Council laying down Community procedures for the authorisation and supervision of medicinal products for human and veterinary use and establishing a European Medicines Agency;
- Staff Regulations of Officials (SR) and the Conditions of Employment of Other Servants of the European Communities (CEOS), in particular Articles 27-34 (SR) and Articles 12-15 and 82-84 (CEOS) and 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.

The processing of special categories of personal data is based on Article 10(2)(a) EUDPR i.e., where you as candidate have given explicit consent to the processing of those personal data for the purposes set out in this data protection notice and Article 10(2)(b) EUDPR i.e., 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.

The active sourcing of passive candidates is based on the consent provided by these candidates.

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

2.3. *Transfer of personal data outside of 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) 2016/679⁶ or the EUDPR.

2.4. *Evaluation, automated decision-making or profiling*

As a part of the application form, candidates must answer pre-defined disqualification and pre-screening questions. Those questions are based on the eligibility and assessment criteria as stated in the vacancy notice 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, s/he may be rejected from being admitted to the selection process. This is explained to the candidates on the page where such pre-screening questions are asked.

The Selection Committee can also use the responses to the pre-screening questions to help them in shortlisting.

⁶ 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](#)

3. How long do we keep your data?

	Disposal of paper and electronic records	
Applications and Candidate profiles in SuccessFactors e-recruitment⁷	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
Second 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 Interests	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 the profile but did never apply:		
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:		

⁷ Should a candidate apply with the same candidate id to multiple selection procedures where different retention periods apply, the candidate id and the application forms will be deleted only once the latest retention period has reached. This is necessary for technical reasons linked to SuccessFactors.

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.

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 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?

We may share your personal data with the following EMA internal departments, 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.

5. Non-automated proctored remote testing

Apart from automated evaluation of the pre-screening questions as set out in section 2.4, no automated processing and/or any kind of profiling takes place. On an ad hoc basis, further to a necessity test, EMA may use non-automated proctored remote testing for specialized knowledge to be tested during a written

test. An appointed person from the external provider is invigilating the exam of a candidate throughout its whole duration without being seen by the candidate.

While the remote testing takes place, candidates are reminded that it is not necessary to disclose any personal information of sensitive nature. For example, they should refrain from accidentally opening an application running in the background or leaving applications open, that could eventually send notifications to the personal computer used by the candidate. Consistently with the rest of the selection process, remote testing is conducted without distinction regarding racial or ethnic origin, political, philosophical or religious beliefs, age or disability, gender or sexual orientation, and without reference to the candidates' marital status or family situation.

The selection panel will be notified of any infringements by candidates and the video recordings will be subject to human verification in that case. The recording is retained for six weeks and will be accessible only to specific trained EMA employees in the TAS service, on a need-to-know basis.

The legal basis for the processing of candidates' data in the context of online recruitment with remote invigilation is Article 5(1)(a) EUDPR, i.e. "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".

6. Your data protection rights

As data subjects, candidates have several rights:

- *Right to be informed* – This data protection notice is aimed at informing candidates how EMA collects and uses their personal data. If you any questions about this data processing, please contact the controller at datacontroller.administration@ema.europa.eu.
- *Right to access* - Candidates have the right to access their personal data. Normally, candidates' data can be access by logging in to the Jobs@EMA e-recruitment system. In addition to this, candidates have the right to request and obtain a copy of the personal data held by EMA.
- *Right to rectification* – Candidates have the right to obtain without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, in this case selection procedure, candidates have the right to have their incomplete personal data completed, prior to the closing date of the vacancy notice, by logging into by logging into their account in the Jobs@EMA e-recruitment system. Note: Data demonstrating compliance with the eligibility and selection criteria may not be updated or corrected after the closing date for the respective selection procedure.
- *Right to withdraw consent* - You have the right to withdraw your consent to the processing of your personal data. However, this will not affect the lawfulness of any processing carried out before consent is withdrawn.

Please note that if you withdraw your consent to the processing of your personal data which is necessary for the processing of your application, this will be considered as a withdrawal of your application. EMA will advise you if this is the case at the time you withdraw your consent.

- *Right to erasure* – candidates have the right to require EMA to delete or stop processing their data, for example where the data is no longer necessary for the purposes of processing.
- *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 of time. For more information about this right and its limitations, see the EMA Data Protection and privacy policy, hosted at [Data protection and privacy at EMA | European Medicines Agency \(EMA\)](#)

- *Right to object* – Candidates have the right to object at any time to the processing of data relating to him or her, except in certain cases, such as where the processing is based on a legal obligation of the data controller.
- *Right to portability* - Where the processing is carried out based on your consent and in automated means, candidates have the right to receive their personal data (which was provided to the data controller by him or her) in a machine-readable format. Candidates may also ask the data controller to directly transfer such data to another controller.

The rights of the data subject's rights can be exercised in accordance with the provisions of EUDPR.

Candidates have also the right to lodge a complaint with the European Data Protection Supervisor (EDPS) at any time at the following address: edps@edps.europa.eu.

Please see detailed information on your rights in the general EMA Data Protection and privacy policy: [Data protection and privacy at EMA | European Medicines Agency \(EMA\)](#).

7. Contact information

In case you have any questions regarding the processing of your personal data, or you think that the processing is unlawful or it is not in compliance with this Data Protection Notice or the general EMA Privacy Statement, please contact the **EMA Data Controller**. The contact details of the Data Controller is the following:

datacontroller.administration@ema.europa.eu

Postal address:

European Medicines Agency
PO Box 71010
1008 BA Amsterdam
The Netherlands

8. Recourse

Complaints, in case of conflict, can be addressed to:

- The Data Controller: datacontroller.administration@ema.europa.eu ; or
- The EMA Data Protection Officer: dataprotection@ema.europa.eu (for data subjects); or
- [The European Data Protection Supervisor](#) (edps@edps.europa.eu)

Annex

Registering at Jobs@EMA

By registering to the e-recruitment system Jobs@EMA:

- I give consent to the European Medicines Agency (EMA or Agency) to process my personal data in accordance with the data protection notice below.
- I understand that the information provided in my application and during the selection procedure will be used in determining my qualifications for possible employment with EMA and during recruitment, as necessary.
- I confirm that the statements made by me in my application are true, accurate, complete and correct to the best of my knowledge and belief.
- I understand I will be requested to supply documentary evidence in support of the statements I make in this application.
- I understand that any misrepresentation or material omission made on an application for employment or other document requested by the Agency may lead to my rejection in the selection process or to termination or dismissal.
- I understand that the Selection Committee will use my responses to the pre-screening questions and my application to determine my eligibility and to assess my suitability for the position, and to determine whether or not I will be invited for further assessments.
- I understand that my personal file will be handled electronically, including, and not limited to offers and contracts issued in relation to future employment.

Please read this Data Protection Notice (document locates on our website under About us -> Legal -> Privacy statement -> [Data Protection Notice for selection and recruitment](#)) carefully prior to providing your personal data into the Jobs@EMA e-recruitment system.

If you do not agree with this data protection notice, you should not provide your personal data.