



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

20 February 2026
EMA/48615/2026

European Medicines Agency's Data Protection Notice for personal data relating to temporary agency workers ('interims')

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 engaging temporary agency workers ('interims').

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 'EUDPR').

1. Who is responsible for processing your data?

1.1. Who is the data controller?

The 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 '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

Regarding the interim selection and your assignment at the Agency, your personal data is processed by EMA (as explained in this notice) and by the temporary worker agency with whom you are registered or have an employment contract.

In this data processing activity, EMA acts as a separate controller from the temporary worker agency with which you are registered or have an employment contract. This data protection notice explains how EMA processes your personal data about your selection and assignment at the Agency as an interim. Accordingly, this notice does not explain how the temporary worker agency processes your data in the context of your employment. For details about data processing by the temporary worker

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](#))



agency, please consult their relevant data protection notices (sometimes called privacy statements), which you should receive directly from your temporary work agency.

To engage interim colleagues, EMA has framework contracts with the following temporary worker agencies:

Provider	Contact Details
Adecco Industrial Flex Solutions B.V.	Hogeweg 123, 5301 LL, Zaltbommel-The Netherlands privacy@adecco.nl
Driessen B.V.	Schootense Dreef 15, 5708 HZ Helmond-The Netherlands info@driessen.nl
Language Matters B.V.	Entrada 500, 2de verdieping 1114 SE, Amsterdam Duivendrecht-The Netherlands info@languagematters.co.uk
Manpower B.V.	Diemerhof 16, 1112 XN, Diemen-The Netherlands dataprivacy@manpowergroup.nl

1.2. Who are the data processors?

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

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); Operation and Maintenance of EMA’s Human Resource Information System (HRIS) 	Hermeslaan 9, 1831 Diegem-Belgium Privacy@sap.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

2. Purpose of data processing

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.² 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.

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.

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.

EMA may also anonymise the data and use it for testing and development purposes of the SAP HRIS platform. This anonymisation is performed by internal EMA system administrators who otherwise support this data processing activity from an information management point of view.

2.1. Personal data concerned

In these processing operations, we process the following data partially collected from the temporary worker agency and partially collected from you directly throughout the selection procedure and your assignment(s) at EMA. Such data may include the following:

Personal data collected from the temporary worker agency

- 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

² Directive 2008/104/EC of the European Parliament and of the Council of 19 November 2008 on temporary agency work, OJ L 327, 5.12.2008, pp. 9–14 (link available [here](#))

the selection criteria as stated in the vacancy announcement, such as professional experience and availability to start;

- 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).

Please note that EMA does not collect and process your data relating to criminal convictions and offences. Such data 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.

Personal data collected from you during your engagement at EMA

- 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 System³, and the emergency mass notification system (voluntary)⁴.

2.2. Legal basis of the processing

The processing of your personal data as mentioned in this Data Protection Notice data in relation to the onboarding and work at EMA is therefore 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. Further, the data processing is necessary (except for the contact details provided voluntarily for the case of emergencies) for the performance of your contract with the temporary worker agency with whom you have a contract or to take steps before the conclusion of such contract on the basis of Article 5(1)(c) EUDPR. Please note that if you refuse to provide such data, you cannot

³ European Medicines Agency's Data Protection Notice For the operation of the Security Access Control System EMA/225532/2023 (link available [here](#))

⁴ European Medicines Agency's Data Protection Notice Use of personal data as part of the Emergency Mass Notification System EMA/519784/2022 (link available [here](#))

work at EMA as an interim, which may have consequences, as explained in your contract with the temporary worker agency.

Other legal bases applying to interims by analogy as for the staff members:

- Articles 11, 11a of the Staff Regulations of Officials and article 11 of the Conditions of Employment of Other Servants of the European Union on the rights and obligations of the officials;⁵
- Article 5, 36(2) and (7) and 61 of the Financial Regulation;⁶
- Article 47 of the Financial Regulation of the EMA⁷.

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 726/2004⁸ on the establishment of EMA in combination with Regulation 2018/1718⁹ on the location of the seat of EMA, Directive 2001/83/EC¹⁰ and Regulations 2019/5¹¹, 2019/6¹² on EMA's role in the authorisation of medicinal products and other applicable Union legislation.

Other EMA internal guidelines, implementing rules and provisions on the procedure are the following:

- Decision of the European Medicines Agency (EMA) 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;¹³
- Decision of the Executive Director on rules concerning the handling of declared interests of national experts on secondment, trainees, interims, visiting and collaborating experts of the European Medicines Agency.¹⁴

2.3. Transfer of personal data outside the EU

Not applicable.

⁵ 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, OJ P 045 14.6.1962, p. 1385 (link available [here](#))

⁶ Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union, OJ L, 2024/2509, 26.9.2024 (link available [here](#))

⁷ Financial Regulation applicable to the budget of the European Medicines Agency from 1 July 2019 EMA/MB/911312/2019 (link available [here](#))

⁸ 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](#))

⁹ 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](#))

¹⁰ 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](#))

¹¹ 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](#))

¹² 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](#))

¹³ Decision of the European Medicines Agency (EMA) 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](#))

¹⁴ Decision of the Executive Director on 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](#))

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
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); ¹⁵ 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 ¹⁶
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> ¹⁷

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

The data listed in Section 2.1 of this Data Protection Notice as '*Personal data collected from you during your engagement at EMA*' are not shared with the temporary worker agency by EMA.

¹⁵ 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 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](#))

¹⁶ Ibid.

¹⁷ Internal guidance for archiving and disposal of documents in HR Rules, Procedures and Partnerships, Staff Matters, and Talent Acquisition services, 0033-2023 EMA/120959/2023

The data listed in Section 2.1 of this Data Protection Notice as '*Personal data collected from you during your engagement at EMA*' will be shared internally and on a need-to-know basis with:

- 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);
- the Executive Director and Assistants to Executive Director, the Deputy Executive Director, the Internal Audit Service, the Legal Department, the Data Protection Officer (DPO).

Requests for access to documents under the provisions of Regulation 1049/2001¹⁸ are handled under EMA's relevant Data Protection Notice on access to documents¹⁹.

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)
- the European Data Protection Supervisor (EDPS).

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 personal data.
- **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 withdraw consent** - If you voluntarily provide emergency contact details, you have the right to withdraw your consent at any time.

¹⁸ Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents (link available [here](#))

¹⁹ European Medicines Agency Privacy Statement concerning requests for information or access to documents EMA/415481/2019 Rev. 2 (link available [here](#))

- **Right to rectification** – You have the right to obtain - without undue delay - the rectification or completion of your personal data if it is incorrect or incomplete.
- **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 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 general EMA Data Protection and Privacy Policy, hosted at [Data protection and privacy at EMA | European Medicines Agency \(EMA\)](#)

For anything that is not explicitly provided for in this privacy notice, please refer to the contents of the general EMA Data Protection and Privacy Policy: [Data protection and privacy at EMA | European Medicines Agency \(EMA\)](#)

Please note that certain rights of data subjects involved in administrative enquiry, disciplinary proceedings or other similar investigations may be restricted following the Decision of the Management Board of the European Medicines Agency on internal rules concerning restrictions of certain rights of data subjects about processing of personal data in the framework of the functioning of the Agency adopted on 12 June 2019 (Article 1)²⁰. Such decisions will be made strictly on a case-by-case basis. The Agency will document the reasons for taking such a decision to demonstrate that the restriction is proportionate and necessary in line with the provisions of the Regulation.

6. Recourse

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 Data Protection and Privacy Policy, please contact the **Data Controller** at: datacontroller.administration@ema.europa.eu

Data subjects may complain to the **EMA Data Protection Officer**: 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 with 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](#)

²⁰ Decision of the Management Board of the European Medicines Agency of 12 June 2019 on internal rules concerning restrictions of certain rights of data subjects in relation to processing of personal data in the framework of the functioning of the Agency (link available [here](#))