



EUROPEAN  
COURT  
OF AUDITORS

## **Data Protection – Privacy Statement**

### **Management of the employment of trainees and questions about traineeships at the European Court of Auditors**

This privacy statement applies to the processing of personal data collected via the portal for questions relating to traineeships, and to processing activities when managing applications for traineeships and the employment of trainees at the European Court of Auditors (ECA).

The way the ECA processes and protects your personal data is described below.

By submitting a question or filling in the traineeship application form on the website, you agree to the processing of your personal data as described in this statement.

#### **Who is responsible for handling your data?**

Data processing operations are under the responsibility of the Directorate of Human Resources Services, Finance and General Services (SG1).

#### **Why do we collect your data?**

SG1 will process your personal data for the following purposes:

- identifying all applicants for traineeships at the ECA;
- supporting trainee selection procedures;
- supporting the procedures for the administrative management of trainees (recruitment, contracts, establishing individual rights, and assignment to posts);
- responding quickly and efficiently to all requests for information about traineeships, including any technical issues encountered during the application process, via the contact form;
- preparing the IT and technical environment corresponding to a trainee's responsibilities in their department;
- assigning access rights to the ECA's buildings and IT systems, in accordance with the requirements of the traineeship;
- supporting financial management procedures and payments for trainees;
- establishing support measures in the event of disability and/or health problems; and
- carrying out evaluations to determine the effectiveness, efficiency, usefulness, and impact of traineeships, as well as application, pre-selection, and selection procedures.

Personal data may be processed further to promote the diversity and accessibility of the traineeship programme; this includes anonymous statistical data, photos/videos taken during traineeships, and voluntary testimonials from trainees from past sessions.

Should any further processing be intended for a purpose other than that for which your personal data have been collected, we will inform you about that other purpose, and provide you with any further information that is required to ensure fair and transparent processing.

## What are the rules governing the use of your data?

[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 (the “**EUDPR**”) is the legal framework for the processing of personal data within the Court.

Your personal data will be processed for the following reasons:

- Article 5.1(a) of the EUDPR: 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;
- Article 5.1(b) of the EUDPR: processing is necessary for compliance with a legal obligation laid down in [Decision No 56-2024](#) on the employment of trainees at the European Court of Auditors. For applicants with disabilities, the additional applicable legal basis is Article 1(d)(4) of the Staff Regulations;
- Article 5.1(c) of the EUDPR: processing is necessary for the performance of the traineeship agreement;
- Article 5.1(d) of the EUDPR: the data subject has given consent to the processing of their personal data for one or more specific purposes (this applies to the processing of photos/videos taken during traineeships and any testimonials provided);
- Article 10(2)(b) of the EUDPR concerning health data: ‘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 and social security and social protection law insofar as it is authorised by Union law providing for appropriate safeguards for the fundamental rights and the interests of the data subject’.

## What personal data do we process?

The following categories of data will be processed:

### **Applicants (prior to recruitment):**

- basic personal information (name, title, nationality, email address, phone number, home address, date of birth, and place of residence);
- information about higher education (diplomas), professional experience, curriculum vitae and motivation letter;
- information about motivations and preferences regarding the type of traineeship and the field of activity;
- information about language and computer skills; and

- for persons applying for the Positive Action Programme: an official document from a national authority or any accredited body confirming their disability or a medical certificate confirming their disability. To limit risks related to the processing of health data, any further information relating to the disability, such as supporting documents or any additional information relating to specific requirements resulting from their disability, will be processed directly by the ECA Medical service in a secure environment.

#### **Selected applicants (prior to recruitment):**

- copy of passport or identity card;
- copy – and translation, if necessary – of the diplomas and proof of studies declared in the application form;
- proof of declared language skills (copy of diplomas/certificates);
- a recent (< 6 months) copy of your judicial record or a certificate of good conduct issued for the civil service by the relevant authority in the country of origin;
- a medical certificate confirming that the applicant is physically fit to work;
- a document proving that the applicant is covered by health insurance, and, optionally, a document proving that the applicant is covered by accident insurance;
- travel expenses and payment orders;
- declaration of absence of conflict of interest;
- where applicable, proof of declared professional experience or international mobility (certificates from employers); and
- updated curriculum vitae and/or letters of reference concerning the applicant.

#### **Recruited candidates:**

- bank details (legal entity form and financial identification);
- electronic photo (used to produce an access card and, with your consent, for publication on the ECA Intranet staff directory, i.e. 'Who-is-Who');
- on the basis of consent: testimonies, group or individual photos/videos; and
- in the event of absence due to illness for longer than the period stipulated in the Staff Regulations: medical certificates justifying the absence.

#### **Contact forms:**

- title, full name, e-mail address and IP address. We will only process other data if you have freely provided them in the enquiry box.

### **Who has access to your data and to whom will your data be disclosed?**

The recruitment process is managed by the Human Resources department (HR). In the context of recruitment, personal data may be accessed by all ECA managers and any ECA staff who have received delegation from a manager, on a need-to-know basis.

The data may be shared with other ECA departments, if deemed necessary in order to reply to your request (e.g. another ECA department responsible for the matter mentioned in the request).

If the data subject has indicated in their application that they have a disability and has sent the disability certificate to the dedicated functional mailbox, the ECA Medical Service and the Diversity and Inclusion Officer may have access to their personal data, on a need-to-know basis.

Other possible recipients of applicants' personal data include the internal and/or external auditors, the Legal Service, and the ECA's translation directorate (if translation is required). Any such sharing is carried out in full compliance with the principle of necessity and proportionality.

If you lodge a complaint, your personal data may be transferred to the European Ombudsman and/or the European Data Protection Supervisor and/or the ECA Data Protection Officer.

## **How long do we keep your data?**

HR only keeps your personal data for the time needed for processing or further processing purposes:

- for contact forms, your personal data will be erased from the register five (5) years after the date on which you submitted your request;
- for applicants who are not selected, data are retained for two (2) years after the date of receipt of the form; and
- for successful candidates for traineeships, data are retained for ten (10) years after the end of the traineeship.

Photos/videos will be stored on external storage devices for no more than one year. Thereafter, they will be immediately deleted from the ECA's shared drives. Photos/videos published on the ECA's website/intranet may be web-archived or kept permanently along with the final publication for historical archiving purposes.

## **How do we safeguard against possible misuse of or unauthorised access to your data?**

Data sets are stored securely at our data centre in Luxembourg, and are covered by numerous measures taken to protect the availability, integrity and confidentiality of the ECA's electronic assets. Access to personal data for registration is restricted to a specific user group.

Access rights are granted on a need-to-know basis, taking account of the role, post and responsibilities of the user concerned. These rights are continually updated as staff assignments change.

The ECA's Secretary-General has overall responsibility for implementing rules on access rights and compliance with data protection rules, but has delegated responsibility in these areas to different entities. The Court has an information security policy, and an Information Security Officer who ensures that the policy is implemented correctly and that the related checks are tested for efficiency.

## **What are your rights?**

Your rights regarding your personal data are set out in Articles 17 to 24 of Regulation (EU) 2018/1725. Further details about your rights are included in this [document](#).

- You have the right to access your personal data, and to have them rectified without undue delay if they are inaccurate or incomplete.

- Under certain conditions, you have the right to ask us to erase your personal data or to restrict their use. Where applicable, you have the right to object to the processing of your personal data, at any time, on grounds relating to your particular situation, and the right to data portability.
- Where the processing of your personal data is based on your consent, you may withdraw that consent at any time, following which your personal data will be irrevocably removed from our records without undue delay and you will be duly informed, unless deletion is prevented by a legal/contractual obligation.
- You are not subject to a decision based solely on automated processing, including profiling when participating in the procedure.
- You can exercise your rights by contacting the data controller, using the contact information given below.

We will consider your request, take a decision, and notify you of it without undue delay, no more than one month after we have received your request. This period may be extended by two further months, where necessary.

### Who should you contact if you have a query or complaint?

The first point of contact is the data controller at [ECA-stage@eca.europa.eu](mailto:ECA-stage@eca.europa.eu).

You may contact the ECA's Data Protection Officer ([ECA-Data-Protection@eca.europa.eu](mailto:ECA-Data-Protection@eca.europa.eu)) at any time if you have any concerns/complaints about the processing of your personal data:

Data Protection Officer  
European Court of Auditors  
12 Rue Alcide de Gasperi  
1615 Luxembourg  
LUXEMBOURG

You have the right to lodge a complaint, at any time, with the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) concerning the processing of your personal data.