



RECORD
of processing activity
according to Article 31 Regulation 2018/1725

NAME of data processing:

Traineeship

Last update: June 2020

1) Controller(s) of data processing operation (Article 31.1(a))

- Controller: Organisational entity of Fusion for Energy (F4E)
 - Unit / Department **responsible** for the processing activity: Human Resources
 - Contact: HR-DataProtection@f4e.europa.eu
- Data Protection Officer (DPO): DataProtectionOfficer@f4e.europa.eu

2) Who is actually conducting the processing? (Article 31.1(a))

The data is processed by F4E (responsible unit) itself

The data is processed by a third party (e.g. contractor) (Art. 29 – Processor) :

Contact point at external third party (e.g. Privacy/Data Protection Officer):

3) Purpose and Description of the processing (Article 31.1(b))

Why is the personal data being processed? Specify the underlying reason for the processing and what you intend to achieve. Describe, summarise the substance of the processing.

When you (later on) intend to further process the data for another purpose, please inform the Data Subject in advance.

Fusion for Energy launches, on a yearly basis, the traineeship programme with a list of specific vacancy notices aimed at young graduates. Once the vacancy is closed, F4E's appointed supervisors review the applications received and decide on a number of candidates to interview. After that, Skype interviews with the selected candidates take place and a reserve list is established.

Personal data are processed in order to check the requirements of applications received so as to enable candidates to participate in the traineeship exercise. The aim of the programme is to promote training in the fusion field and in the ITER project, as well as to allow university graduates to provide their contribution to the work carried out by F4E.

4) Lawfulness of the processing (Article 5(a)–(d)):

Mention the legal bases which justifies the processing

Processing necessary for:

- (a) performance of tasks in the public interest attributed by EU legislation (including management and functioning of F4E)

a. Council Decision of 27 March 2007 “establishing the European Joint Undertaking for ITER and the Development of Fusion Energy and conferring advantages upon it” - 2007/198/Euratom, as last amended by Council Decision of 22 February 2021 (2021/281 Euratom), O.J. L 62, 23.02.2021, p.8, in particular Article 6 thereof;

b. Statutes annexed to the Council Decision (Euratom) No 198/2007 “establishing the European Joint Undertaking for ITER and the Development of Fusion Energy and conferring advantages upon it”, as last amended on 22 February 2021, in particular Article 10 thereof;

- Decision of the Director of Fusion for Energy on the Traineeship scheme signed on 7 April 2015 (F4E_D_3234EM).

- [Amendment nr 1 to the Decision of Director of Fusion for Energy on Traineeship Scheme of 07 April 2015 \(F4E_D_25PWZL\).](#)

- Annual Decision of the Director on the specific year's traineeship programme (setting the number of trainees and other administrative yearly issues)

- (b) compliance with a *specific* legal obligation for F4E to process personal data

(c) necessary for the performance of a contract with the data subject or to prepare such a contract.....

(d) Data subject has given consent (ex ante, freely given, specific, informed and unambiguous consent)

Consent is given by the candidates when they submit the application to the traineeship programme via the online tool. Also, consent is requested to share the candidates' name and telephone numbers for network purposes among trainees.

5) Description of the data subjects (Article 31.1(c))

Whose personal data is being processed?

External persons who send their application to specific vacancy notices published on F4E's external website as candidates to the traineeship scheme.

6) Categories of personal data processed (Article 31.1(c))

Please give details in relation to (a) and (b). In case data categories differ between different categories of data subjects, please explain as well.

(a) **General personal data:**

At the application stage:

- Personal data (application form): surname, first name, nationality, date of birth, email, address and contact details (telephone numbers);
- Education and training details (application form): academic diploma obtained indicating the year of completion, languages spoken;
- Curriculum vitae and a motivation letter in which, in addition to the above information, they also include:
 - o Professional experience/internships if any;
 - o Any additional information related to personal data, which may be relevant for the position.

At the candidate selection stage:

- Candidate's Skype ID for the remote selection interview from a non-F4E computer.
- Prior to the beginning of the traineeship, candidates who have successfully passed the selection are required to provide:
 - o Photocopies of documents which prove the admission requirements (nationality, age, etc.);
 - o Traineeship agreement, stating the trainee's approval of the offer made by Fusion for Energy and including a photograph
 - o Financial Identification Form and Legal Entity Form – for payment of the traineeship allowance;
 - o Documents proving that the data subject has public or private cover for sickness insurance for the entire duration of the traineeship period (in particular form E-111 for nationals of the Member States).

At the end of the traineeship:

- Report at the end of the traineeship with the activities carried out and evaluated by the supervisor, and the HoU's signature
- Traineeship certificate including the name, date of birth, nationality, period of traineeship
- Certificate for tax declaration purposes

(b) Sensitive personal data (Article 10)

Processing of other personal data and/or sensitive data is not foreseen or expected. However, it is not excluded that during the skype interview such data may be disclosed. The latter are not recorded or stored.

7) Recipient(s) of the data (Article 31.1 (d)) – Who has access to the personal data?

Recipients are all people to whom the personal data is disclosed ("need to know principle"). Not necessary to mention entities that may have access in the course of a particular investigation (e.g. OLAF, Court, EDPS).

The following recipients have access to the personal data processed:

- Human Resources Officer(s) responsible for the Traineeship scheme;
- Human Resources Officer(s) dealing with the recruitment of the trainee/-s;
- Process Owner: The Head of Human Resources Unit;

- The Head of the Administration Department;
 - F4E Director;
 - Another person internally may be consulted if deemed necessary by the Appointing Authority for a specified case;
 - The trainee’s supervisor and any other person from the service where a trainee is required;
 - The Project Team Leader/Head of Unit in which the trainee is assigned to;
 - The secretary/assistant of the area where the trainee is assigned to during the selection process;
 - The financial officer in charge of the payment of the monthly allowance for trainees;
 - Accountant(s);
 - IDM Manager, if necessary for support;
 - ICT Officer responsible for the dedicated database, if necessary for technical support.
- Also, only if appropriate and necessary for monitoring or inspection tasks, access may be given to: e.g. DPO and Anti-Fraud & Ethics Officer, Head and/or responsible officer of LSU, IAC, IDOC.

8) Transfers to third countries or International Organizations (Article 31.1 (e))
If the personal data is transferred outside the EU, this needs to be specifically mentioned, since it increases the risks of the processing operation (Article 47 ff.).

Data is transferred to third countries or International Organizations recipients:

Yes

No

If yes, specify to which country/IO:

If yes, specify under which safeguards and add reference :

- Adequacy Decision (from the Commission)
- Memorandum of Understanding between public authorities/bodies
- Standard Data Protection Clauses (from the EDPS/Commission).....
- Binding Corporate Rules
- Others, e.g. contractual/agreements (subject to authorisation by the EDPS).....

Reference: Not Applicable

9) Technical and organisational security measures (Articles 31.1(g) and 33)

Please specify where the data is stored (paperwise and/or electronically) during and after the processing. Specify how it is protected ensuring “confidentiality, integrity and availability”. State in particular the “level of security ensured, appropriate to the risk”.

Security measures are implemented to ensure integrity, confidentiality and availability of information. The default provisions include backups, centralized logging, software updates and continuous vulnerability assessment and follow-up. Specific provisions resulting from the characteristics of the information system may lead into the implementation of encryption, two factor authentication among others found relevant following a risk analysis.

10) Retention time (Article 4(e))

How long is it necessary to retain the data and what is the justification for this retention period? If appropriate, differentiate between the categories of personal data. If the retention period is unknown, please indicate the criteria for determining it.

- Files on successful applicants are kept for 2 years and then eliminated, except for the personal data processed for the following purposes:
 - o Successful candidates' personal data needed to re-issue the training certificate are kept for 35 years and then they are eliminated:
 - name of trainee, duration of traineeship;
 - Date of traineeship, department and service
 - o The processing of successful candidates' personal data related to financial issues is covered by the [record on Contract Implementation](#) (F4E_D_2GBTAX).
- Files on non-successful applicants are kept for 2 years and then they are eliminated.

Fusion for Energy may continue to store Personal Data for a longer period, as may be necessary for internal auditing and for the establishment, exercise or defense of legal claims until such claims are finally resolved.

11) Information/Transparency (Article 14-15)

Information shall be given in a concise, transparent and easily accessible form, using clear and plain language.

A Privacy Notice (PN) on traineeship has been established (F4E_D_24PD4M) and published on the F4ENet in the respective HR section and in the [Data Protection Register](#). It is in particular being published in the Privacy Policy section on the F4E website.

The PN provides the information required under Articles 15 and 16 of 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 data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2001/EC.*