



Privacy Statement on the protection of personal data in relation to the career development review (CDR)

All personal data are processed in accordance with the provisions of 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 (hereinafter – Regulation 2018/1725).

1. Who is the controller regarding the processing of your personal data?

The controller is Cedefop and the responsible department/service is the Department for Resources and Support / Human Resources

2. What is the purpose of processing your personal data?

The purpose of the processing is to assess individual performance in the course of a given reporting period in line with the provisions in the Staff Regulations of Officials of the European Union (SR) and the Conditions of Employment of Other Servants of the European Union (CEOS)

3. What personal data are collected and processed?

The following personal data are processed: name, personal number, job title, type of contract and grade of the person. Also, the department/service in which the person works, his/her objectives set for a given year, his/her appraisal of the performance, whether the performance is considered satisfactory or not.

What is the legal basis for the processing of your personal data?

The legal basis for the processing activity is:

Article 5(1)(b) of Regulation (EU) 2018/1725 – necessary for compliance with a legal obligation to which the controller is subject.

Articles 43 and first paragraph of Article 44 of the Staff Regulations of officials of the European Union as well as Articles 15(2), 20(4) and 87(1) of the Conditions of Employment of other servants of the European Union.

4. Who has access to your personal data and to whom they are disclosed?

Access to your personal data is granted to:

- Jobholders (officials, temporary and contract staff at Cedefop)
- Reporting officers (the jobholder's hierarchical superior)
- Reporting officers by delegation
- Countersigning officers
- Appeal assessor

- Staff in the Human Resource service dealing with appraisal and/or promotion/reclassification processes

For processes in which they are involved

The following may be provided with a copy of the CDR report:

- Members of the Appeals Committee
- members of the Joint Promotion and Reclassification Committee
- persons responsible for examining appeals pursuant to Article 90 and cases brought before the court;
- staff members in charge of inquiries and disciplinary proceedings;
- auditing/supervisory bodies (IAS, Court of Auditors, OLAF, EDPS)
- external contractors of Cedefop if and when needed to perform the duties they were hired for (e.g. an external lawyer)

5. For how long are your personal data kept?

Personal data will be kept up to a maximum period of calendar year plus 10 years. The finalised appraisal report is filed in the jobholder's personal file for which the retention schedule is 8 years after the extinction of all rights of the person concerned and of any dependants but at least 120 years after the date of birth of the person concerned.

6. Are there any transfers of your personal data to countries outside the EU/EEA?

Microsoft Ireland Operations Ltd., as a processor for Sharepoint (the tool for storing information and documents by Cedefop) may transfer personal data to Microsoft Corporation located in the US and acting as a sub-processor. The categories of personal data that might be transferred are limited to a) identification data, for some limited cases of Multi-factor authentication, b) diagnostic/telemetry (essential services) data, c) aggregated-service generated data and d) connected experience data (only processed but not stored in the US). Any transfers to Microsoft Corporation are covered by the recently adopted EU-US Data Privacy Framework (2023), of which Microsoft Corporation with its 18 entities are active participants.

7. What are your rights and how can you exercise them?

You have the right to request from the controller access to and rectification or erasure of your personal data or restriction of processing.

You also have the right to object to the processing of your personal data

o exercise the mentioned rights, you may contact the controller by sending an email to: hr_data_protection@cedefop.europa.eu.

The controller shall provide information on action taken on a request within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

If you consider your data protection rights have been breached, you may always lodge a complaint with the Cedefop's Data Protection Officer (data-protection-officer@cedefop.europa.eu) or with the European Data Protection Supervisor (edps@edps.europa.eu).

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