

Cedefop record of processing activity

Promotion/Reclassification Procedure

Record of Cedefop activities processing personal data, based on Article 31 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 1247/2002/EC.

Nr.	Item	Description
1.	Last update of this record	06/07/2023
2.	Reference number	Case no 2012-009
3.	Name and contact details of controller	Cedefop – European Centre for the Development of Vocational Training Postal address: Cedefop Service Post, Europe 123, 570 01 Thessaloniki, GREECE Telephone: (+30) 2310-490111 Email: info@cedefop.europa.eu Responsible department or role: DRS / Human Resources Functional email address for enquiries on processing of personal data: hr_data_protection@cedefop.europa.eu
4.	Name and contact details of DPO	data-protection-officer@cedefop.europa.eu
5.	Name and contact details of joint controller (where applicable)	n/a
6.	Name and contact details of processor (where applicable)	• Designated HR staff members dealing with the promotion/reclassification procedure • Executive Director, Deputy Director, Heads of Department • Members of the Joint Promotion and Reclassification Committee (JPRC) • Microsoft 365 platform used for management of Cedefop's documents, records and collaboration. See CDFNOT005 - Microsoft 365 Documents, Records management and Collaboration.
7.	Very short description and purpose of the processing	Description and purpose of the processing:

		The purpose of the processing is to ensure career progression. Data are processed to assess whether the staff member meets the formal eligibility criteria for promotion/reclassification to the next higher grade and to provide the information required by management to assess merit in the promotion/reclassification procedure. Legal basis of the processing operation: • Article 45 of the Staff Regulations • Articles 54 and 87(3) of the Conditions of Employment of Other Servants • Cedefop implementing provisions: Cedefop/DGE/27/2016 for promotion of officials, Cedefop/DGE/28/2016 for reclassification of TAs, and Cedefop/DGE/29/2016 for reclassification of CAs.
8.	Description of categories of persons whose data Cedefop processes and list of data categories	Data subjects: officials, temporary agents, and contract agents currently in employment with Cedefop. Categories of personal data processed: • Promotion/reclassification files: ○ Overview of all Cedefop staff (including name, surname, department, contractual status, grade, third language requirement, previous promotions/reclassifications, time in grade, eligible Y/N, comments about inclusion/exclusion in the list of eligible staff); ○ Information on overall language skills of all staff members; ○ Level of responsibility of staff; ○ Minutes of meeting(s) in which merits of all eligible staff are compared; ○ Lists of eligible/proposed/promoted staff (including name and surname, department, contractual status, and grade of staff members with time in grade); ○ Complaints submitted to the JPRC regarding non-inclusion in the draft list of proposed staff for promotion/reclassification. Complaints form includes: name and surname, department/service,

		personal number, contractual status, grade, reasoned complaint, list of the objective criteria to support the complaint, date, signature. ○ Promotion/reclassification decisions are filed in the relevant staff members' personal file. ● Personal files: ○ Each staff member has access to their own CDR assessments in their personal file; ○ Information on performance (CDR reports) since the latest promotions/reclassifications or recruitment, information on the 3rd language requirement (for officials and temporary agents only). Special categories of data: No special categories of data are processed. However, all data processing regarding promotion/reclassification is confidential (labelled as SNC and encrypted).
9.	Time limit for keeping the data	The retention period for the promotion/reclassification files is 10 years and destruction following Cedefop's records management retention schedule. Information on performance (CDRs) and decisions on promotion/reclassification are placed in the relevant personal files and have the same retention period as the personal files.
10.	Recipients of the data	Processors: ● Designated HR staff members dealing with the promotion/reclassification procedure; ● Executive Director; ● Deputy Director; ● Heads of Department. Data may also be disclosed to the following: ● Members of the JPRC, who process complaints regarding non-inclusion in the draft list of staff proposed for promotion, by exercising professional

		discretion as stated in their confidentiality declaration made available to all staff; • Members of the Staff Committee, invited to discuss the draft list of proposals with the Executive Director, who may offer explanations regarding the inclusion or exclusion of staff members from the draft list, in doing so providing information regarding the performance/abilities of individuals; • All Cedefop staff, who request access to their own promotion/reclassification file; • All Cedefop staff receive the lists of eligible staff, the list of proposed staff, and the final list of promoted/reclassified staff; • Cedefop legal advisors (internal or external); • PMO, informed regarding change of grade of promoted/reclassified staff); • Auditing and other supervisory bodies (IAS, Court of Auditors, OLAF, EDPS).
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	n/a
12.	General description of security measures where possible.	• Physical documents are kept in a hard copy file stored in a locked filing cabinet to which only authorised HR staff has access; • Electronic documents are stored in Cedefop's Electronic Document Management System, an auditable environment where restricted access controls are applied; • All data processing is confidential. Application of document-level encryption for the protection of Sensitive Non-Classified (SNC) information, through the use of M365 "Sensitivity labels"; • Communication of data is restricted to those persons who "need to know" for the performance of their duties.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	Privacy Statement available on intranet and circulated to staff with the announcement of a promotion/reclassification round.