

DATA PROTECTION RECRUITMENT POLICY OF THE EUROPEAN COMMUNICATIONS OFFICE (ECO)

1 Generally

- 1.1 This Data Protection Recruitment Policy ('Policy') applies to all data which you provide to us and/or which we collect about you in connection with your application for a position with us. In this Policy you can read more about the data we collect, how we handle your data and how long we will retain your data etc. It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It also provides you with certain information that must be provided under the General Data Protection Regulation. Please read this Policy and contact us if any aspect of the Policy is unacceptable to you. The current version of the Policy is always available at www.cept.org.

2 Data Controller

- 2.1 The data controller responsible for the processing of your personal data is:

European Communications Office, ECO

Nyropsgade 37, 4.

1602 Copenhagen V

Denmark

Telephone +45 3389 6300

Email address: eco@eco.cept.org

Reg. (CVR) no. 15244607

- 2.2 The general legal processing framework is Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, and the attendant rules.
- 2.3 All questions concerning this Policy, the processing of your data and any suspected non-compliance should initially be directed to Mette Tobiassen, Finance and HR, tel +45 3389 6304, email: mette.tobiassen@eco.cept.org.

3 Definitions

- 3.1 Some of the most important terms of data protection law are defined below:

Personal Data

Any information relating to an identified or identifiable

natural person. This means all information which, directly or indirectly, alone or when combined, can identify a particular natural person.

Data Controller

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.

Data Processor

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller

Processing

Any operation or set of operations which is performed on Personal Data or on sets of Personal Data such as collection, recording, structuring, alteration, consultation, combination, disclosure by transmission or transfer to persons, public authorities, companies, etc. outside the Company.

GDPR

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, and the attendant rules.

4 Purpose of processing

4.1 We process your Personal Data for the purpose of potentially offering you a position with us.

5 Personal Data we process about you

5.1 In connection with your application for work with us, we will collect, store, and use the following categories of Personal Data about you:

- The information you have provided to us in your curriculum vitae, covering letter and emails.
- Any information you provide to us during an interview.
- Test results and work on test assignments made during the recruitment process.

5.2 We collect Personal Data about candidates from the following sources:

- You, the candidate.
- Your named referees, from whom we collect the following categories of Personal Data: position, area of work, period of employment and work performance.

6 Why we process your Personal Data

6.1 We process your Personal Data for the purposes described below:

- Assess your skills, qualifications, and suitability for the position or role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

7 What is our legal basis for processing your Personal Data?

7.1 It is necessary for us to process your Personal Data to decide whether to enter into an employment contract with you.

7.2 It is also in our legitimate interests to process your Personal Data when deciding whether to appoint you to a position or role as the interests of our organisation in connection with appointment of the right employees override your interest.

7.3 Having received your CV and covering letter or your application form and the results from possible tests, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the position. If you do, we will decide whether you should be invited to a personal interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the position. If we decide to offer you the position, we will then take up references from your named referees before confirming your appointment.

8 Sharing your Personal Data

8.1 We will only share your Personal Data with the following third parties for the purposes of processing your application: Selection Panel, which comprises of members from ECO member administrations.

8.2 We may share your Personal Data with the suppliers and business partners assisting us with IT management, hosting, and other IT related services. This means that we may share your data with, for example, our service providers, technical support and banks.

8.3 All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your Personal Data in line with our policies and we do not allow our third-party service providers to use your Personal Data for their own purposes. We only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

9 Retention and erasure of your Personal Data

9.1 We will retain your Personal Data for a period of 6 months after we have communicated to you our decision about whether to appoint you to the position. We retain your Personal Data for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your Personal Data in accordance with our data retention policy and applicable laws and regulations.

10 Your rights

10.1 Access

10.1.1 You have the right to access the Personal Data we process about you. By writing to us (at the above address – see clause 2.1), you may request access to the Personal Data we hold about you, including the purposes for which the data were collected. We will comply with your request as soon as possible.

10.2 Rectification and erasure

10.2.1 You have the right to request rectification, supplementary Processing, erasure or blocking of the Personal Data we process about you. We will comply with your request as soon as possible, to the extent necessary. If, for some reason, your request cannot be complied with, we will contact you.

10.3 Restriction of Processing

10.3.1 In certain circumstances, you have the right to restrict the Processing of your Personal Data. Please contact us if you would like to restrict the Processing of your Personal Data.

10.4 Data portability

10.4.1 You have the right to receive your Personal Data (only data about you which you yourself have provided to us) in a structured, commonly used and machine-readable format (data portability). Please contact us if you would like to exercise your rights concerning data portability.

10.5 Right to object

10.5.1 You have the right to ask us not to process your Personal Data in cases where the Processing is based on Article 6(1)(e) (performance of a task carried out in the public interest or in the exercise of official authority) or Article 6(1)(f) (legitimate interests). The extent to which we process your data for such purposes is described in this Policy. You may exercise the right to object at any time by contacting us.

10.6 Withdrawal of consent

10.6.1 If the Processing of your Personal Data is based on your consent, you have the right to withdraw consent at any time. If you withdraw consent, this will not affect the legality of the Processing that was carried out before such withdrawal. Please contact us if you would like to withdraw consent.

10.7 Please write to mette.tobiassen@eco.cept.org if you wish to exercise one or more of the above rights.

10.8 Your exercise of the above rights may be subject to conditions or restrictions. For example, you may not be entitled to data portability in all situations – this will depend on the circumstances of the relevant Processing activity in each case.

11 Any consequences of not providing your Personal Data

11.1 If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

12 Use of automated decision making

12.1 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

13 Security

13.1 At the ECO, our Processing of Personal Data is governed by our Information Security Rules. Our Information Security Rules also lay down how to carry out risk assessments and impact analysis of existing as well as new or changed Processing activities. We have implemented internal rules and procedures to provide and maintain appropriate security from collection to erasure of Personal Data, and we will only engage Data Processors to process our Personal Data if they maintain a similar appropriate security level.

14 Complaints to supervisory authority

14.1 Any complaint about our Processing of your Personal Data may be submitted to the Danish Data Protection Agency:

The Danish Data Protection Agency, Borgergade 28, 5th floor, 1300 Copenhagen K, Denmark, tel.: +45 3319 3200, email: dt@datatilsynet.dk.

15 Updating this Policy

15.1 ECO is required to comply with the fundamental principles of data protection and privacy law. Therefore, we will review this Policy on a regular basis to keep it up to date and ensure compliance with applicable principles and law. This Policy is subject to change without notice. Material changes will be announced on our website and an updated version of the Policy will be made available.

This version of the Policy is effective 7 May 2018.