

<b>01 - Name of processing</b>	<b>Training of ERA staff</b>
02 - Reference	23
03 - Submission Date	19-03-12
04 - Last update	09-09-21
05a - Controller	RICOTTA Salvatore
05b - Unit-Sector	Human Resources
05c - Controller's email	HoUResourcesandSupport@era.europa.eu
06 - DPO	DataProtectionOfficer@era.europa.eu 120 Rue Marc Lefrancq, 59300 Valenciennes, France Tel.+33 (0) 32 70 96 500
07 - Name and contact details of joint controller (where applicable)	
08a - Who is actually conducting the processing? (Article 31.1(a))	The data is processed by ERA (responsible unit) itself
08b - Name and contact details of processor (where applicable)	N/A
09 - Purpose of processing	Collection and processing of data with the purpose of planning training actions for staff members, and for accommodating the training needs of staff in order to meet the requirements of the service.
10a - Data Subjects	<ul style="list-style-type: none"> <li>- The data subjects are all statutory staff and SNEs at the ERA who request a training within the ERA policy framework either on their own individual initiative and/or in the interest of the service</li> <li>-For French language courses, the data subject can be also the spouse/partner of a staff member</li> <li>-Trainers provided by ERA internally (ERA staff), ERA's contractors via FCs, the European Commission via the Service Level Agreement signed with the EC</li> </ul>

## 10b - Personal data

The data subjects are all statutory staff & SNEs at the ERA who request(ed) training within the ERA policy framework either on their own individual initiative or in the interest of the service. The following categories of personal data can be distinguished:

- Data deriving from the CDR, containing the list of training/personal development needs of staff: name, surname, function group and grade, reporting officer
- Data related to (external trainers): C.V., remuneration, contractor
- Personal data on the training registration forms:

For training courses on staff member's own initiative: Name applicant, personnel number applicant, name and address of organisation hosting the course, signature applicant, authorisation and signature from immediate supervisor and from Executive Director.

For language courses: Name applicant, first name applicant, authorisation and name of the hierarchical superior.

For courses on the initiative of a department / unit / team: Name applicant, function.

The personal data described above are necessary for processing the registration of the participants in the training courses and for counter-checking the data against the invoices received from DG HR or external training providers.

11 - Time limit for keeping the data

- Financial files contain the registration form (paper based) for external trainings are stored in a dedicated sharepoint library.
- Paper based records / certificates are stored in the personnel file;
- Training applications and presence lists are justification documents for the payment of the external contractor and therefore kept for the periods determined under the Financial Regulation as justification for the payment of contractors/training providers invoices (5 years after discharge);
- Training evaluation documents are stored in the EU-lear portal which is not managed by ERA, but by the EC and goverend by its data protection notification.
- Training evaluation documents for languages courses are stored by the contractor.

12 - Recipients of the data

- Designated staff in the HR team;
- Hierarchical superiors of training candidates for authorisation/validation;
- Trainers (a specific Data Protection provision in inserted in the framework contracts).
- In particular circumstances data may be disclosed on a temporary basis to:
  - Judges of the Civil Service Tribunal, at their request, or
  - The Prosecutor's office by request, or
  - OLAF and/or the IDOC within the frame of their inquests, or
  - The Ombudsman, at his request, or
  - The European Data Protection Supervisor, at his request.

13 - Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?

N/A

14 - How is data stored? What are the security measures implemented?

Paper documents related to training are stored in cupboards (in personnel files) to which only authorised HR staff have access.  
e-documents are stored in a dedicated sharepoint library.

15 - For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable) see the data protection notice

a) Once in duty, staff members and SNEs are informed during the induction sessions about the ERA training policy and its implementation and the data protection policy at the ERA. They are also informed they are allowed access to their data in order to check/verify/consult their contents or to take copies of documents. It is also explained that under no circumstances they are entitled to add/remove documents. Any amendment/alteration/modification/correction/deletion of the training data must be duly justified introduced by the staff (via the Data Controller for corrections and deletions) and executed by the designated actors in the HR sector.  
 b) staff are taught how to use the EU-Learn portal  
 c) staff are shown the L&D intranet page where they can find information on (language)courses, external contractors, L&D offers, L&D procedure, L&D plan, L&D report.

15a - Data subject rights	Right to have access; Right to rectify
16 - Legal Basis	Amendment to the Agency's Founding Regulation; Staff Regulations and CEOS and implementing Rules; Train(ing) on Track at ERA; Train(ing) on track at ERA - Action plan;
17 - Lawfulness of processing	Article 5 b) of Regulation (EU) 2018/1725 The personal data described above are necessary for processing the registration of the participants in the training courses and for counter-checking the data against the invoices received from DG HR or external training providers.
18 - Data minimisation	To accurately plan training actions for staff members and to accommodate the training needs of staff in order to meet the requirements of the service or for their own personal interest.
19 - Accuracy	The data processed by HR are correct and derive from the HR databases from which data are generated directly into EU-Learn. For language courses and external contractors the designated HR actors provide the limited data (i.e. name, surname, function) needed for the contractor to know.
20 - Threshold assessment	NA
21 - Special category data	NA

22 - DPIA

NA

23 - Link to the Threshold assessment-Risks

24 - Other related documents