European Maritime Safety Agency

RECORDING OF PROCESSING ACTIVITY

NOTIFICATION TO THE DATA PROTECTION OFFICER
(ARTICLE 31 REGULATION 1725/2018)

NAME OF PROCESSING ACTIVITY[1]: Management of the Internal Call for Applications at EMSA

1) Controller(s)[2] of data processing operation (Article 31.1(a))
Controller: European Maritime Safety Agency (EMSA) Organisational unit responsible[3] for the processing activity: Unit 4.1, Human Resources and Internal Support. Data Controller: Cristina Romay Lopez, Head of Unit 4.1, Human Resources and Internal Support. Data Protection Officer (DPO): Radostina Nedeva-Maegerlein: dpo@emsa.europa.eu
2) Who is actually conducting the processing? (Article 31.1(a))[4]
The data is processed by EMSA itself. x The organisational unit conducting the processing activity is: Unit 4.1, Human Resources and Internal Support.
The data is processed by a third party (contractor) ☒ or the processing operation is conducted together with an external third party Should online proctoring be used for written tests, this will be governed by Ares(2024)7838194- Online proctoring of written tests in the selection procedures for 2(f) temporary agents, 3(a) contract agents positions at EMSA: Record + Privacy Statement.

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

[1] **Personal** data is any information relating to an identified or identifiable natural person, i.e. someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity. This information may, for example, be the name, date of birth, a telephone number, biometric data, medical data, a picture, professional details, etc.
Processing means any operation or set of operations which is performed on personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

[2] In case of more than one controller (e.g. joint operations), all controllers need to be listed here

[3] This is the unit that decides that the processing takes place and why.

[4] Is EMSA itself conducting the processing? Or has a provider been contracted?

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EMSA, Praça Europa 4, 1249-206 Lisbon, Portugal / emsa.europa.eu

Why are the personal data being processed? Specify the rationale and underlying reason for the processing and describe the individual steps used for the processing.

The personal data are processed for the purpose of managing internal mobility procedures within EMSA in accordance with Administrative Notice 14/2025. The processing ensures that internal vacancy calls are launched, applications are assessed, and decisions on internal transfers are taken in a transparent, fair and impartial manner. Personal data are processed to evaluate the suitability, competencies and motivation of internal candidates for positions that become available within the Agency.

The processing is necessary to foster internal mobility, support career development of EMSA staff, and ensure efficient workforce planning by enabling EMSA to identify and select the most suitable internal candidates before any external recruitment is considered.

Description of the processing steps:

Publication of the internal vacancy

– When a vacancy is approved, the internal call is published on the EMSA Intranet for a period of two weeks, within the full grade bracket applicable to AD/AST officials or relevant function group for contract agents.

Submission of applications

– EMSA staff members submit their applications (Application form, CV and motivation letter) directly to HR via the internal procedure.

Preparation of the selection process

– After the closing date, the Selection Team prepares the interview selection process and may also decide to carry out a written exercise if they believe that the required skills cannot be determined solely through the interview.

Evaluation by the Selection Team

– Members declare any conflict of interest before the evaluation of the application; HR assesses neutrality. (Ares(2020)1954087 - Notification to the DPO (ARTICLE 31 REGULATION 1725/2018)- Declaration of Conflicts of Interest for recruitment procedure)

– The Selection Team (Head of Department/Unit, one expert, HR representative, Staff Committee representative) evaluates all applications and completes the evaluation form.

Interview and written test (if applicable)

– Internal candidates that are invited to interview are given at least one week's notice.

– Personal data processed at this stage may include professional experience, skills, performance elements shared by the candidate, and results of assessments.

Conclusion of the internal mobility procedure

– HR prepares a report for the AIPN listing candidates suitable for the position.

– The AIPN may consult appraisal reports before deciding whom to transfer internally.

– The selected candidate is notified by HR.

– Candidates not selected are informed of the outcome and may request feedback.

Post-procedure actions

– No reserve list is established for internal procedures.

– If no suitable internal candidate is found, external reserve lists or external procedures may subsequently be launched, but internal candidate data remain used solely for the internal mobility procedure.

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

Mention the legal basis which justifies the processing

(a) a task carried out in the public interest or
in the exercise of official authority vested in EMSA
(including management and functioning of the institution) x

ADMINISTRATIVE NOTICE 14/2025: Internal mobility - simplification of internal calls

(b) compliance with a legal obligation to which EMSA is subject

(c) necessary for the performance of a contract with the data subject or for the preparation of such a contract

(d) Data subject has given consent (*ex ante*, explicit, informed)

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

Whose personal data are being processed?

EMSA staff ☒

Temporary Agents and Contract Agents

Non-EMSA staff (contractors staff, external experts, trainees) ☐

Visitors to EMSA building ☐

Relatives of the data subject ☐

Other (please specify):

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

Please tick all that apply and give details where appropriate

(a) **General personal data:**

The personal data contains:

Personal details (name, address etc) ☒

First name, Family name, Date of birth, Nationality, Contact details

Education & Training details ☒

Secondary and higher education, University or equivalent, Other education/Training received.

Knowledge of languages: level of English, other languages and level.

Employment details ☒

Employment history (positions, duties, years of experience), Description of functions and professional tasks, Information on current grade and contract type (temporary/contract), Relevant professional experience and examples provided in the application form (e.g., explanation of essential and advantageous criteria)

Financial details ☐

Family, lifestyle and social circumstances ☐

Goods or services provided ☐

Other (please give details): Technical skills, soft skills, and job-specific competencies, Explanation of motivation to apply, additional background information included in the CV or motivation letter, Any further details provided in free-text sections of the application form.

(b) **Sensitive personal data** (Article 10)

Racial or ethnic origin	☐
Political opinions	☐
Religious or philosophical beliefs	☐
Trade union membership	☐
Genetic, biometric or data concerning health	☐
Information regarding an individual's sex life or sexual orientation	☐

7) Recipient(s) of the data (Article 31.1 (d))

Recipients are all parties who have access to the personal data

Data subjects themselves ☒

Candidates can ask EMSA for additional information upon completion of the procedure.

Managers of data subjects ☒

The current Head of Unit/Department is consulted to agree in a transfer date.

Designated EMSA staff members ☒

The Appointing Authority, the Human Resources staff and members of the selection teams.

Designated Contractors' staff members ☒

Should online proctoring be used for written tests.

Other (please specify): Access will be given to EU staff with the statutory right to access the data required by their function, i.e. the European Ombudsman, the Civil Service Tribunal, the Internal Audit Service, the European Court of Auditors, OLAF and the European Data Protection Supervisor.

8) Transfers to third countries or recipients outside the EEA (Article 31.1 (e))

If the personal data are transferred outside the European Economic Area, this needs to be specifically mentioned, since it increases the risks of the processing operation.

Data are transferred to third country recipients:

Yes ☐

No ☒

If yes, specify to which country:

If yes, specify under which safeguards:

Adequacy Decision of the European Commission ☐

Standard Contractual Clauses ☐

Binding Corporate Rules ☐

Memorandum of Understanding between public authorities ☐

9) Technical and organisational security measures (Article 31.1(g))

Please specify where the data are stored during and after the processing

How is the data stored?

EMSA network shared drive ☒

Only accessible to staff members responsible for the recruitment procedures within Unit 4.1, Human Resources and Internal Support.

Outlook Folder(s) ☒

There is a dedicated Outlook folder created for each recruitment procedure.

Hardcopy file	☐
Cloud (give details, e.g. public cloud)	☐
Servers of external provider	☐
Other (please specify): The full set of recruitment documentation is stored in ARES.	☒

10) Retention time (Article 4(e))

How long will the data be retained and what is the justification for the retention period? Keep in mind that there are pre-determined retention periods for most types of files. Those are explained in the Records Management Policy and Procedure of the Agency. You can check EMSA Records Management Policy and Procedure here.

For the main recruitment file, based on a sampling and selection, the files can be destroyed 10 years after the file is closed, which is usually when the AIPN decision is signed and all candidates informed about the outcome of the procedure.

Files on candidates invited for a selection interview are destroyed after 10 years. Files on candidates not invited for a selection interview are destroyed after 2 years.

Electronically signed on 05/02/2026 16:45 (UTC+01)