

## **PROTECTION OF YOUR PERSONAL DATA**

**This privacy statement provides information about the processing and the protection of your personal data**

### **1. Introduction**

The European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (hereafter, 'eu-LISA') is committed to protect your personal data and to respect your privacy. eu-LISA collects and further processes personal data pursuant to 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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data

The information in relation to the processing operation '*Use of LinkedIn Premium for Talent Outreach*' undertaken by *Human Resources Unit* is presented below. *Please note that LinkedIn acts as independent data controller when processing personal data within the LinkedIn platform, for which LinkedIn determines the means and the purposes. For more information on the processing of personal data by LinkedIn, please consult the relevant notice (LinkedIn Privacy Policy).*

### **2. Why and how do we process your personal data?**

HR Unit at eu-LISA collects and uses your personal information to:

1) identify *qualified potential candidates through LinkedIn sourcing and encourage you to apply for relevant open selection procedures. LinkedIn Premium is therefore used as a talent outreach tool to enable eu-LISA to reach a larger talent pool of relevant profiles who:*

- *may not be familiar with eu-LISA and its work, or*
- *are not actively seeking a new job but could still be interested in opportunities aligned with the Agency's mission.*

*The overall purpose is to increase the visibility of ongoing selection procedures and eventually of the number of applicants.*

2) *As this is a new HR talent outreach activity, statistics (anonymised when possible) will also be collected to measure the effectiveness of this new strategy.*

Your personal data will not be used for automated decision-making including profiling.

Your personal data processed may be reused for the purpose of procedures before the EU Courts, national courts, or the European Court of Auditors.

### **3. On what legal ground(s) do we process your personal data**

We process your personal data, because:

## PUBLIC

Under article 5(1) (a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body:

Recruitment is a vital function for the proper management and functioning of the Agency. In light of the current challenges eu-LISA faces to recruit people, the envisaged use of LinkedIn Premium as an outreach tool will enable eu-LISA to reach a larger talent pool of relevant talent, increase the visibility of ongoing recruitment procedures and attract a higher number of qualified applicants. As this is a new HR strategy, statistics are also necessary to measure the effectiveness of this talent outreach activity.

### **Which personal data do we collect and further process?**

In order to carry out this processing operation the *HR Unit in eu-LISA* collects the following categories of personal data:

*For statistics:* Full name, link to LinkedIn profile, date of first outreach/message, and whether user indeed applied for a vacancy and/or accepted offer.

*For the Talent Sourcing and outreach activity,* eu-LISA has access to the following categories of data: any data available on LinkedIn user's profile, like full name, current location, profile picture, history of professional experience, details on education, potential certificates, knowledge of EU languages and any other data that might be available via accessing a LinkedIn user's profile, including chat messages between eu-LISA and the LinkedIn user. This data will be processed to identify and reach out to potential profiles that are relevant to each open vacancy and encourage them to apply through eu-LISA's career portal. Depending on the vacancy, different "sourcing criteria" will be pre-defined. This data processing activity takes place exclusively within the LinkedIn Platform.

### **4. How long do we keep your personal data?**

*The HR Unit in eu-LISA* only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing. The personal data processed for statistics outside the LinkedIn platform are retained by eu-LISA until one month after the establishment of reserve list of the specific vacancy in relation to which eu-LISA contacted you, as a LinkedIn user. Afterwards only anonymised data will be kept without the ability to reidentify individuals.

When determining the maximum retention periods, the Agency takes also into account possible legal recourses, legal, auditing, archiving and reporting obligations.

### **5. Who has access to your personal data and to whom is it disclosed?**

Access to your personal data is provided to designated eu-LISA staff members responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

*Only anonymised statistics that do not contain personal data will be shared with other departments within eu-LISA.*

*Please note that international data transfers (USA) will take place when using the LinkedIn platform. LinkedIn Corporation participates in the EU-US Data Privacy Framework and is covered by the relevant adequacy decision.*

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

## **6. What are your rights and how can you exercise them?**

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. You also have the right to object to the processing or the right to data portability.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor.

## **7. Contact information**

### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, (*eu-LISA's* HR Unit: EULISA RECRUITMENT <eulisa-RECRUITMENT@eulisa.europa.eu).

### **- The Data Protection Officer of eu-LISA**

You may also contact the Data Protection Officer ([dpo@eulisa.europa.eu](mailto:dpo@eulisa.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

### **- The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can [lodge a complaint](#)) to the European Data Protection Supervisor if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.