

## **Notification to the Data Protection Officer under Article 25 of the Rules on Data Protection (Decision 235/16/COL) ('the Rules')**

Changes affecting the information contained in the notification must be notified promptly to the Data Protection Officer, see Article 25(3) of the Rules.

Date of submission: 22.11.2017

### **Part 1: Processing**

- Unit responsible for the processing operation

ADM

- Name of processing operation

Moot Court competitions.

- General description of the processing operation

The Moot Court competitions are a recruitment and outreach initiative organised in collaboration with law Faculties and student organisations in the EEA EFTA states. The aim is to build interest in and awareness of EEA law amongst students in the EEA EFTA states in order that they may apply to join ESA in the future and/or pursue a career in EEA law in their home country.

Participants' personal data is collated with their written submissions in order that feedback can be sought from them after the competition.

Competition winners are invited on a study trip to visit the EFTA & EU institutions, which is organised by ESA and which necessitates the collation of personal information.

Participant feedback is collected via email after the competitions and study trips and ESA regularly updates a "Moot Alumni Tracker" spreadsheet logging the professional development and contact details of former participants. Feedback is also collated from those involved as Law Faculty members, coaches and judges.

Promotional photography is carried out during competitions and study visits for the purposes of promoting competitions.

- Sub-contractors

N/A

- Automated / Manual operations

Participants manually complete the contact details information form when submitting their written pleadings.

Feedback respondents complete an online questionnaire, which is submitted to HR electronically.

Moot Court winners complete a “Personal Information Form” manually and submit this, along with a scanned copy of their passport, by email to HR.

- Storage

Personal data is stored in hard copy in a restricted access filing cabinet and/or in a restricted access case in ESA’s document management system (GoPro).

Promotional photographs are stored electronically in GoPro and are accessible to HR staff, along with those staff involved in the organisation of the competition. They may also be published on ESA’s website and in promotional material and shared with Faculties and student organisations for the purposes of promoting the competitions.

- Comments

- Security measures

Personal data stored in hard copy is kept in locked cabinets, with the keys being available to HR & Finance.

Personal data in GoPro is access restricted to HR and Finance and certain non-HR staff members involved with the Moot Court project.

Promotional photographs are stored electronically in GoPro and are accessible to HR and IT staff, along with those staff involved in the organisation of the competition. They may also be published on ESA’s website and in promotional material and shared with Faculties and student organisations for the purposes of promoting the competitions.

## Part 2: Purpose and legal basis

- The purpose(s) of the processing operation

Feedback is collected and ESA regularly updates a “Moot Alumni Tracker” spreadsheet for the purposes of continuous improvement and understanding the impact of the competition on recruitment and outreach.

To enable and facilitate the logistical arrangements of study visits, personal data is collated and shared with EFTA/EU institutions, who require this in order to meet their internal security requirements and accept visitors. This may also include personal data of ESA staff, who accompany the winners on the study visit.

- The legal basis of the processing operation

EFTA Surveillance Authority Decision 235/16/COL on Data Protection Rules Article 5(d), Financial Regulations and Rules and Policy & Procedure on Recruitment, Appointment, Renewal and Prolongation.

### Part 3: Data subjects/fields

- Categories of data subjects

Participants and winners in the EEA Law Moot Court competitions, Faculty contacts, judges, coaches and student organisers. ESA staff members accompanying study visits.

- Categories of data / Data fields

All participants: Name, photos, year of study, place of study, email address, career progression information, feedback.

Winners: Date of birth, phone number, passport data, bank account details, emergency contacts' names and phone numbers.

Faculty contacts/judges/coaches/student organisers: Name, photos, email address and feedback.

ESA staff members: Name, photos, passport data, date of birth.

### Part 4: Rights of the data subjects

- Information to be provided to the data subjects

Privacy statement provided to participants with the Moot problem documents, covering their participation and, where applicable, involvement in the study visit.

Privacy statement provided to Faculty members/judges/coaches/student organisers with the request to participate and request for feedback.

- Procedure to grant rights

Authority procedure for data subject requests (DSR) (Document no 863894)

- Retention policy and time limit

Participants: Data is retained indefinitely (with the express consent of the data subject) in order to permit continued review of the impact of the competitions.

Case: 80285

Document: 870610

Winners: Other than the data covered under “Participants” data is deleted after the winners’ week is completed.

Faculty contacts/judges/coaches/student contacts: Data is retained indefinitely in order to permit continued review of the impact of the competitions. However, this is anonymised wherever possible and practical.

Bank account information is retained for five financial years, in accordance with the retention requirements set out in the Financial Regulations and Rules.

Promotional photos are retained for five years.

## Part 5: Recipients

- Categories of recipients of the data

HR and Financial Department following the “need to know” principle, as well as certain ESA staff involved in the organisation of the Moot Courts.

- Transfer of the data

Faculty contacts, judges, coaches, student organisations, EU and EFTA institutions.