



Record of processing activity No 21 - Reclassification

Title	Reclassification
Name and contact details of controller	ECCC, People and Resources Unit – Corporate Services Sector – Human Resources (hr[at]eccc.europa.eu)
Name and contact details of DPO	data-protection [at] eccc.europa.eu
Name and contact details of Joint Controller	N/A
Name and contact details of processor	Microsoft Ireland Operations Ltd, for the provision of Microsoft 365 services acquired under SLA DIGIT-073-00, where reclassification-related documents and communications are processed or stored in ECCC Microsoft 365 services.
Purpose of the processing	To facilitate the reclassification exercise, performed annually and identify the best performers each year on the basis of comparison of merits of eligible staff members in the same function group and grade in order to determine who will be promoted.
Description of data subjects	ECCC staff members who are eligible for a reclassification namely: Temporary Agents referred to in Article 2(f) of the CEOS who may be eligible for reclassification to the next higher grade, with the exclusions/limitations set out in the applicable ECCC implementing rules; and Contract Agents employed under Article 3a of the CEOS who may be eligible for reclassification. This includes staff members eligible for reclassification, proposed for reclassification, not proposed and/or lodging a complaint against non-inclusion on the draft list, recommended by the Joint Reclassification Committee, and finally reclassified or not reclassified. The processing may also concern the Executive Director/AACC, Heads of Unit or equivalent, HR staff, members or delegates of the Staff Committee, members and alternates of the Joint Reclassification Committee, members of the Joint Committee examining the exercise, and other authorised staff involved in the procedure on a need-to-know basis.
Description of data categories	personal identification data (first name, last name, personal ID); career-related data (position, grade, unit, start date, type of contract, administrative status, objectives, language requirements) as well as

	current or previous reports which contain opinions of staff member and managers on the performance and training needs of the jobholder.
Time limits (for the erasure of data)	The personal data concerned will be kept for a maximum period of 10 years after the extinction of all rights of the staff member at the end of the career. Data will be deleted at the end of this period.
Data recipients	• Within ECCC: ○ authorised HR staff; ○ the Executive Director/AACC; ○ Joint Reclassification committee (e.g. Heads of Unit or equivalent) involved in the comparative examination of merits; members/delegates of the Staff Committee where involved in the discussion or staff-representative proposals; members and alternates of the Joint Reclassification Committee; ○ authorised staff involved in publishing/communicating the draft and final lists and in giving staff members access to relevant information related to their individual procedure; and other authorised staff strictly where necessary on a need-to-know basis. The draft list of staff proposed for reclassification and the final list of staff reclassified are communicated/published for the attention of ECCC staff by administrative notice in accordance with the applicable procedure. Individual information is made available to the staff member concerned in accordance with the procedure and without prejudice to the confidentiality of the deliberations and documents of the Joint Reclassification Committee. • Outside ECCC: ○ duly authorised IT/system administrators strictly where necessary for operation, maintenance, troubleshooting

	or security of the relevant systems, and ○ EU bodies charged with monitoring or inspection tasks in application of EU law (e.g. internal audits, Court of Auditors, European Anti-fraud Office – OLAF, European Public Prosecutor’s Office - EPPO)
Transfers to third countries	No transfer of personal data outside the EU/EEA or to international organisations is foreseen for this processing activity.
Security measures – General description	Reclassification information is handled as a confidential HR/staff matter. Access is limited to authorised actors according to their role in the procedure and on a need-to-know basis. The deliberations and documents of the Joint Reclassification Committee are confidential. Members of the Joint Reclassification Committee are subject to conflict-of-interest requirements and must refrain from participating where a personal interest could impair, or be perceived by third parties as impairing, their independence. Where an electronic system is used to administer the exercise, it shall be secure and contain only the information required for the comparative examination; in the absence of an electronic system, the procedure may be carried out manually and relevant safeguards apply mutatis mutandis. Where ECCC Microsoft 365 services are used, ECCC applies the technical and organisational security measures applicable to Microsoft 365 E5 under SLA DIGIT-073-00 and its internal information-security/access-management procedures. Moreover, computers are password protected.
Privacy statement	A dedicated Data Protection Notice for the ECCC reclassification exercise is made available to ECCC staff via the ECCC intranet.