

DATA PROTECTION NOTICE

on remote invigilation testing for recruitment of Temporary and Contract Agents

Last updated: 06 October 2025

As an EU Agency, Eurofound embraces the need to protect your personal data. We, therefore, undertake to process it, as data controller, with respect to the applicable law¹.

If after reading this notice you still have questions on the processing of your data, please contact us at dataprotectionofficer@eurofound.europa.eu. We will reply to you within one month.

Why do we need to process your data?

Your personal data is processed in order to conduct online written tests with remote invigilation in the context of selection and recruitment procedures of temporary and contract agents carried out by Eurofound. To know more about these recruitment procedures, please read the [dedicated data protection notice](#).

No automated decision is taken by Eurofound on any of its recruitment procedures.

Who is responsible for the processing of your personal data?

Eurofound acts as data controller and is responsible for the processing of your personal data for the purpose above identified.

The remote invigilation of the online written tests is carried out by our data processor, TestReach Ltd., an Ireland-based company specialising in digital examination solutions². TestReach corporate office is located in Block 9-10, Nexus Ucd, Belfield Office Park,

¹ [Regulation \(EU\) 2018/1725 of the European Parliament and of the Council 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](#) (or the EUDPR).

² More information on TestReach Ltd. can be found [here](#).

Beech Hill Rd, Clonskeagh, Dublin 4, D04 V2N9, Ireland.

What data do we need from you?

The following types of personal data are collected when using TestReach:

a) Exam Candidate Personal Information:

- First and last name
- Email address
- Phone number
- Candidate ID or application number
- Demographic information
- Recruitment procedure the candidate is applying for
- Special adjustments for the exam if applicable (e.g., additional time allowed).

b) Candidate Exam Information:

- Responses given
- Score
- Results data (e.g., pass / fail status)
- Access and activity data (e.g., start and end times of the exam; date and time of candidate's activities [login, logout, answers submitted])
- Video of candidate taking the exam, including voice and likeness

c) And related administrative data:

- Notes on any incidents of non-compliance or suspected cheating

d) Identification and system metadata:

- IP address
- Browser header data (user agent)
- Device / browser type

- Processes running,
- CPU & RAM usage statistics
- Installed drivers
- Peripherals connected
- Cookies
- Support / troubleshooting related data if candidate contacts technical support

Given the nature of the project, incidental processing of additional categories of personal data may occur. For example, objects visible in the background during webcam recordings may unintentionally reveal special categories of personal data, such as information relating to religious beliefs or political opinions. The collection and further processing of such data is entirely incidental and will not be taken into account, in any way, for the purposes of conducting the remote invigilation or completing the recruitment procedure, including for selecting the best candidate(s).

What is the legal basis for processing your data?

The legal bases for the processing of personal data for recruiting Temporary and Contract Agents are:

- Staff Regulations of Officials of the European Union, and Articles 10, 12, 13, 53, 56, 82, 83 and 86 of the Conditions of Employment of Other Servants of the European Union;
- Model decision of 13.11.2015 laying down general implementing provisions on the procedure governing the engagement and use of temporary staff under Article 2(f) of the CEOS as regards decentralised agencies and joint undertakings;
- Decision of the Governing Board of Europol of 21 December 2018 on middle management staff; and
- Commission Decision of 16.10.2017 on the general provisions for implementing Article 79(2) of the Conditions of Employment of Other Servants of the European Union, governing the conditions of employment of contract staff employed by the Commission under the terms of Articles 3a and 3b thereof.

The processing of your personal data is, therefore, necessary for the performance of a task carried out by Eurofound in the public interest, namely organising and implementing selection and recruitment procedures and, in this way, Eurofound's ability to fulfil its institutional tasks ³.

In some cases, candidates may voluntarily disclose a disability to request reasonable accommodation. This is treated as explicit consent⁴ and is also justified as necessary for Eurofound to comply with obligations in employment and social protection law, including ensuring equal treatment⁵.

Who will process your data?

At Eurofound, your personal data may be disclosed to the following categories of recipients:

- Staff members assigned to the HR unit;
- Members of the Selection Committee;
- Executive Director as Appointing Authority / Authority Empowered to Conclude Contracts ;
- Legal Officer in case of any (pre)litigation proceedings;
- Duly authorised staff members of the European Commission assigned to DGHR Legal Service in case of any pre-litigation proceedings;
- Duly authorised staff members of the Court of Justice of the European Union in case of any litigation proceedings; and
- Eurofound's external lawyers in case of any litigation proceedings.

In addition, any of the supervisory instances of the Agency (i.e. the European Court of Auditors, the Internal Audit Service, and in case of controversy, the European Union Civil

³ Article 5(1)(a) and recital (22) of the EUDPR read in conjunction with Article 18 of [Regulation \(EU\) 2019/127 of the European Parliament and of the Council of 16 January 2019 establishing the European Foundation for the improvement of living and working conditions \(Eurofound\), and repealing Council Regulation \(EEC\) No 1365/75](#).

⁴ Article 10(2)(a) of the EUDPR.

⁵ Article 10(2)(b) of the EUDPR.

Service Tribunal, the European Ombudsman, etc.) might be granted access to personal data of candidates upon request.

Finally, TestReach receives in advance the names and contact details of the candidates taking the test (first and last name, email address and phone number) together with the references of the applicable recruitment procedure. Further identification takes place on the date of the invigilated test via video (candidates are requested to show proof of ID). The invigilator monitors the candidates and their screens during the online test, which are recorded. TestReach then pseudonymises the candidates' test and shares them with Eurofound, together with a decoding file for candidate identification and an execution report. The video recording may be further shared with the Selection Committee members or other internal stakeholders only a need-to-know basis, in order to respond to a possible complaint submitted by the candidate or in case there is a dispute about possible cheating.

For how long will we retain your data?

The following retention periods apply:

- Video data: held for a period of 6 weeks after which it is deleted, unless there is a need to hold it for longer (e.g., e.g., the case of detected irregularities);
- Support, troubleshooting data: retained for as long as necessary to respond to the issue, correspondence with candidate, improve support documentation, etc.; and
- Other data processed during the selection and recruitment procedures: kept in line with the dedicated [data protection notice](#).

Do we transfer your data to outside the EU?

No.



What are your rights?

Within the limits set by the EUDPR, you have the right to access, rectify, erase and/or port your personal data, to restrict or object to the processing of your personal data, and to withdraw your consent (if obtained). Just note that withdrawal of your consent does not affect the lawfulness of processing while your consent was valid.

You may contact us at hr@eurofound.europa.eu with your requests. Your request is free of charge. However, if it is manifestly unfounded or excessive, Eurofound may refuse to act on it.

You also have the right to raise a complaint with the European Data Protection Supervisor should you consider that this processing is in violation of the law. You will find more information [here](#).