

Privacy Notice

This privacy notice explains what personal data EMBL collects, for what purposes, how it is processed, and how we keep it secure, in the context of:

Application to the EMBL International PhD Programme

1. Who is responsible for the processing

The EMBL data controller (and joint-controller if applicable) contact details are:

EMBL Heidelberg
Meyerhofstraße 1 69117 Heidelberg Germany
+49 6221 387-0
graduate-office@embl.org

2. What personal data do we process

The following categories of personal data may be processed:

Applicants:

Core Personal Information:

- Basic identifiers (name, date of birth, nationality)
- Contact details (email, phone, address)
- Professional details (employer, job role, department)

Account & Technical Data:

- Login credentials
- System access logs
- Usage data (timestamps of submissions)

Professional & Academic Data:

- Education and qualifications
- Publications and presentations
- Research interests and activities

Event & Communication Data:

- Feedback and surveys

Custom value:

- Referee details for minimum two and maximum three references, including their contact details, first and last name, institution
- Where they heard about the programme and whether they have ever worked at EMBL. If they have/are working at EMBL, the details of the positions, including dates of the affiliation, position, name of previous supervisor are asked for

Contextual information:

- On a voluntary basis, applicants can provide additional information about circumstances that may have influenced their education/professional experiences up to date

Additional information:

- Applicants needing a visa for on-site interviews may be asked to share their passport details to prepare a visa notification letter that will be sent to the German Foreign Office to help with the visa application process

Referees:

- Name, email, institution and reference
- Upon consent, contact details may be available to other Principle Investigators outside EMBL in the shared applicant pool
- Technical data related to entering the reference website (i.e. system access logs and timestamps of submission)

Principle Investigators having access to the shared applicant pool:

- For verifying the eligibility criteria: email, name, institute/university, based country, current position, whether they are EMBL alumnus, whether they are a principal investigator, and the number of PhD students 'trained'
- Information necessary to create an account to access the shared applicant pool: Login credentials (i.e. email and password) and system access logs

If applicable, the following categories of sensitive data may be processed:

Applicants: On a voluntary basis, applicants may provide information about any disabilities or special needs (health related data). This information is only accessible to the EMBL Graduate Office and may be used to make any necessary arrangements for interviews. Data will be available only to the Graduate Office and not shared during any evaluation stage without specific need and the applicant's authorisation

3. For what purposes do we process your personal data

Personal data will be processed for the following purposes:

The primary purpose of collecting data is to consider applicants for a Predoctoral Fellowship at EMBL. The information provided will allow the EICAT Internal Training team, EMBL Faculty, external partner Group Leaders (GTLs), and, in some cases, EMBL Postdoctoral Fellows to evaluate applicants' suitability for the programme.

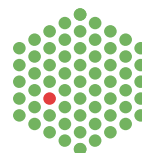
The external partner GTLs may include, for example, Professors from the University of Heidelberg who are part of the Molecular Medicine Partnership Unit at EMBL Heidelberg; or external collaborators. To participate in the EIPP selection process, they sign a confidentiality agreement with the programme.

EMBL Postdoctoral Fellows get involved in the evaluation process when application numbers are high and after signing a similar confidentiality agreement.

Personal data will be processed for the following purposes:

1. Selection process for the EIPP

- Applications are checked for eligibility against the programme's eligibility requirements by the EMBL Graduate Office (GO)
- EMBL Faculty and/or Postdoctoral Fellows evaluate all eligible written applications according to the EIPP selection criteria to provide an initial screening of written applications
- All recruiting GTLs can access all applications for individual review and shortlisting of applications for interviews
- Recruiting GTLs may contact candidates via contact details indicated on the application form to conduct online pre-screening interviews
- The GO sends out invitations to the Virtual Panel Assessment (VPA) to shortlisted candidates and organizes panel interviews. The VPA is a formal interview that qualifies candidates for admission to the EIPP. Each panel should consist of three EMBL Faculty members and may include members of the EICAT-Internal Training team as observers, who receive full details of the applicants assigned to them for interviewing
- Based on the VPA evaluations, EIPP selection criteria, and needs of recruiting GTLs, recruiting GTLs further shortlist up to two candidates per open position to be invited for onsite interviews



- With support of Unit Administration, the GO is responsible for coordinating candidate travel and onsite interview schedules in collaboration with the Units, which include individual interviews with the potential supervisors, meetings with their lab members, and (on a voluntary basis) social activities with current EMBL PhD students
- Following the onsite interactions, candidates are asked to submit their preferences of research groups in ranked order, which are shared with all recruiting GTLs
- The GTLs confirm their offer decisions to the GO, who sends out the formal offers to candidates.

Throughout the selection process, all application details are accessible to the EMBL Graduate Committee (GC), which consists of EMBL Faculty members and the EICAT-Internal Training team. The GC reviews applications selected for VPA in a shortlisting meeting; as well as the candidates put forward to receive fellowship offers in an offers meeting.

For successful applicants, and upon acceptance, their personal data necessary to start the hire process and prepare the employment contract (including full name and email address) will be introduced in EMBL's recruitment system (managed by EMBL Human Resources Department). More information on how personal data is processed in the recruitment platform is available in the dedicated privacy notice. In addition, the full application (including references and evaluation scores) is added to the Fellows Management module, an EMBL database for maintaining record of PhD students enrolled in EIPP.

The referees indicated by the applicants in their application form will receive a link to complete an online reference form. They do not have access to the application. Applicants will not have access to the referees' reference. Referees will receive a copy of their reference by email upon completion of the reference form.

2. Other purposes for data processing

- In addition to the specific purposes outlined above, we may process personal data as necessary to comply with our internal policies and governance frameworks. This includes activities undertaken to protect our legitimate interests, such as ensuring the efficient operation of our PhD Programme, conducting statistical analyses, or improving processes, provided such processing is compatible with the original purposes of data collection.
- The shared applicant pool is a voluntary function for which applicants can opt-in during the application process. The purpose of this function is to share applications not selected for the EIPP with other external GTLs that have access to this service. This may provide additional opportunities for applicants to find relevant opportunities outside of EIPP and for external GTLs to find candidates to fill their positions. If applicants opt in, their application, including personal and contact information, as well as the information related to their education, training and research interests will be added to the shared applicant pool. The reference letters and evaluations (i.e. content of the reference) for the EIPP are not shared. Although, contact details of referees may be shared, if referees consent at the time of providing the reference. The EMBL Graduate Office grants access to scientists who request access by filling in and submitting the online request form, for two years renewable. The request is reviewed by the Graduated Office and is granted to scientists who hold Group Leader positions at the subscription time and subscribe with their institutional email address. Once access is granted, external GTLs need to activate their account by setting up an individual password. Some group leaders who receive access to the pool may be from non-EEA countries. They can come from other academic institutes, universities, clinics, etc. If interested, they may contact directly the applicant.

4. What is the legal basis for processing

We rely on the following legal basis(es) to process personal data:

The processing is necessary for the recruitment of PhDs and based on Article 7(1)(a) of IP68.

The processing relating to the shared applicant pool is based on Article 6(3): consent. Consent can be withdrawn at anytime by writing to EMBL.

5. Who can access your personal data

The following categories of recipients may access the personal data:

EMBL internal recipients:

EMBL Barcelona, Grenoble, Hamburg and Rome:

- Administration
- All GTLs/TLs

EMBL Heidelberg:

- Director´s Office
- HR
- ISG Hotel & Guesthouses
- IT Services
- Internal Training
- Photolab (names for badges)
- All GTLs/TLs

EMBL-EBI Hinxton:

- Research Office
- Human Resources
- All GTLs/TLs

EMBL external recipients:

Entity processing data on their own behalf:

- External partner GTLs may include Professors from the University of Heidelberg who are part of the Molecular Medicine Partnership Unit at EMBL Heidelberg, or external collaborators on joint grants
- Group Leaders from other institutes who receive access to the shared applicant pool (only in cases where candidate opted-in for this service).
- German Foreign Office, if applicants need support for a visa for on-site interviews.

Processors:

- HR recruitment system (Workday).

Location:

Within and outside the EEA:

- Some group leaders who receive access to the shared applicant pool may be from non-EEA countries. They can come from other academic institutes, universities, clinics, etc. They are asked to keep the personal data within the shared applicant pool and to not download or share the candidate's information.

6. How long do we keep your personal data

Personal data will be kept for the following period of time:

Retention envisaged time limits:

Personal data will be retained even if the service is no longer available. Data is kept for the minimum amount of time possible to ensure legal compliance and the possibility to undergo internal and external audits.

Retention period rational:

Data will be retained for as long as necessary. Applications in the shared applicant pool will be kept until the next round of PhD programme applications (typically every 6 months). Afterwards, personal data will be replaced with the ones of the new round of applications. For the GTLs having access to the shared applicant pool, their access and profile will automatically expire after two years. They may ask to renew their access.

7. How do we protect your personal data

We have adopted the following measures to protect personal data:

1. Risk Management & Controls: Regular risk assessments of information assets, Implementation of control measures, Periodic review of access rights.
2. Training & Access: Mandatory security awareness and data protection training, Access granted based on job roles, Strict management of privileged accounts, Cryptographic key management.
3. Incident Response & Recovery: Cyber security incident management process, Regular penetration testing, Disaster recovery planning, Business continuity measures.
4. Compliance & Privacy: Protection of personal data in adherence with IP68 and other contractual obligations, Biometric data security, Rigorous due diligence of third party data hosting such as cloud services, Regular compliance monitoring.

8. Data subjects' rights and oversight mechanism

Under [Article 16 of the EMBL Internal Policy No 68](#), data subjects have the following rights:

- a right not to be subject to a decision made by automated means (i.e. without any human intervention)
- a right to request access to your personal data
- a right to request information on the reasoning underlying data processing
- a right to object to the processing of personal data
- a right to request erasure or rectification of your personal data.

When the legal basis to process personal data is consent, please note that you have the right to withdraw your consent at anytime.

Please note that those rights can be subject to limitations, as described in [Article 16 \(2\) of the EMBL Internal Policy No 68](#).

If you wish to exercise your rights or wish to contact the data controller regarding any other data protection related matters, you can contact us using, by sending an e-mail to: info@embl.de or by sending a letter to: Meyerhofstraße 1 69117 Heidelberg Germany.

Advice on data protection matters can also be obtained from the EMBL Data Protection Officer (DPO), under [Article 20 \(2\) of the EMBL Internal Policy No 68](#). The DPO can be reached by email at dpo@embl.org or by letter at: EMBL Data Protection Officer, EMBL Heidelberg, Meyerhofstraße 1, 69117 Heidelberg, Germany.

If you wish to complain under [Article 25\(1\) of the EMBL Internal Policy No 68](#), you may do so with the DPO by email at dpo@embl.org.

If you believe that the response of the DPO is unsatisfactory or if the DPO has failed to respond within three months from receipt of the complaint, you may complain in writing to the Data Protection Committee. It can be reached by email at dpc@embl.org or by post at: EMBL Heidelberg, Data Protection Committee, Meyerhofstraße 1, 69117 Heidelberg, Germany.

Last update:

26/08/2025