

## RECORD OF PERSONAL DATA PROCESSING ACTIVITY according to Article 31 of Regulation (EU) 2018/1725

### ► THEMATIC REVIEW OF THE FAIR TREATMENT OF CONSUMERS WITH CHRONIC ILLNESSES

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#### GENERAL INFORMATION

Introduction
<p>The European Insurance and Occupational Pension authority (EIOPA) is committed to protect individuals with regard to the processing of their personal data in accordance with Article 31 of the Regulation (EU) No 2018/1725 (further referred to as “the EUDP Regulation”)<sup>1</sup>.</p> <p>This record covers two aspects:</p> <ul style="list-style-type: none"> <li>• Mandatory records under Article 31 of the EUDP Regulation (publicly available)</li> <li>• Compliance check and risk screening (internal only to the Agency, not published)</li> </ul>
Contact Details of EIOPA's Data Controller
<p>Valérie Mariatte-Wood, EIOPA's Head of Consumer Protection Department Westhafen Tower, Westhafenplatz 1, 60327 Frankfurt am Main, Germany <a href="mailto:DataController@eiopa.europa.eu">DataController@eiopa.europa.eu</a></p>
Contact Details of EIOPA's Data Protection Officer
<p>Alinde Terstegen-Verhaag, EIOPA's Data Protection Officer Westhafen Tower, Westhafenplatz 1, 60327 Frankfurt am Main, Germany <a href="mailto:dpo@eiopa.europa.eu">dpo@eiopa.europa.eu</a> Date of Consultation: [10/11/2025]</p>

<sup>1</sup> 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

Contact Details of EIOPA's Processors
<p>EIOPA's Team/Unit/Department responsible for the processing: Designated EIOPA staff members working on the Thematic Review, within EIOPA's Consumer Protection Department.</p> <p>Personal data may be shared with the following:</p> <ul style="list-style-type: none"> <li>- Designated EIOPA staff members in the Consumer Protection Department, EIOPA's Senior Management</li> <li>- Board of Supervisor Members.</li> </ul>
Contact Details of External Processor(s) / Joint Controller(s)
<p><input checked="" type="checkbox"/> External processors: EU Survey and EU Login</p> <p><input type="checkbox"/> Joint controller(s): .....</p> <p><input type="checkbox"/> N/A</p> <p>The data is also processed by two (2) third parties, that are EU Survey and EU Login.</p> <p>EU Survey is the European Commission's multilingual online survey management system built for the creation and publication of surveys and public consultations. The data is collected and stored in a secured and protected database hosted by the Data Centre of the European Commission.</p> <p>The European Commission (DG DIGIT<sup>2</sup>) is processor for the:</p> <ul style="list-style-type: none"> <li>- Web-based interface for the survey owner and the contributors,</li> <li>- Hosting of the survey data and any submitted responses.</li> </ul> <p>EU Login is the European Commission's user authentication service. It allows authorised users to access a wide range of Commission web services, using a single email address and password.</p> <p>In cases EU Login is used, the European Commission (DG DIGIT) is the controller for all processing operations related to keeping an EU Login account and to the authentication itself. DG DIGIT is responsible for the processing of personal data collected and processed for traffic statistics and analytics via Europa Analytics, the corporate service that monitors and evaluates the effectiveness and efficiency of the EC's websites.</p>

## DESCRIPTION AND PURPOSE OF THE PROCESSING

Description of Processing
<p>In the context of the thematic review of the fair treatment of consumers with chronic health conditions, EIOPA has decided to complement information collected from insurers, with first-hand patient experience. For this purpose, EIOPA has reached out to three patient associations (the International Diabetes Federation;</p>

<sup>2</sup> The Directorate-General for Digital Services is the Commission department responsible for digital services that support other Commission departments and EU institutions in their daily work and that help public administrations in EU member countries.

European Aids Treatment Group; and EuroHealth) to disseminate a patient survey via the EU Survey tool, to thereby anonymously collect insights into the challenges which patients with certain chronic illness(es) face when buying and/or using insurance products. The patient survey includes a limited set of questions regarding sensitive health-related personal data, which EIOPA will collect with the view to identify potential problems regarding access to the insurance market for certain types of consumers.

The creation and management of the survey on the European Commission's EU Survey tool requires login via EU Login. For further information on the processing of personal data by EU Login and the EU Survey tool, please refer to the dedicated processing operations:

- Commission's EU Survey [record of processing](#) and [privacy statement](#)
- Commission's EU Login [record of processing](#) and [privacy statement](#)

The personal data will not be used for any purposes other than the performance of the activities specified above. Otherwise, data subjects will be informed accordingly.

Please note that the European Commission is not responsible for the privacy policies or practices carried out by the people or organisations using the EU Survey application and service to create and publish a survey. All personal data collected within such a survey will be processed by and under the responsibility of the survey owner or survey owner's organisation.

#### Purpose (s) of the processing

- ☐ Staff administration
- ☐ Relations with external parties
- ☐ Procurement and accounting
- ☐ Administration of membership records
- ☐ Auditing
- ☐ Information administration
- ☒ Other (please give details): for EIOPA's Thematic Review on the fair treatment of consumers with chronic illnesses. Please see above for more information.

#### Lawfulness of Processing

- Legal Basis justifying the processing, in accordance with Article 9(1)(aa) of Regulation (EU) No 1094/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority<sup>3</sup> (further referred to as "the EIOPA Regulation"), the Authority shall take a leading role in consumer protection and financial services across the market, in particular by conducting in-depth thematic reviews of market conduct, to identify potential problems and analyse their impact.

<sup>3</sup> Regulation (EU) No 1094/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Insurance and Occupational Pensions Authority), amending Decision No 716/2009/EC and repealing Commission Decision 2009/79/EC, OJ L 331, 15.12.2010, pp. 48–83.

- In addition, in accordance with Article 5(1) of the EUDP Regulation, processing of personal data is lawful as it is necessary for the performance of a task carried out in the public interest.
  - The processing of your personal data is also based on the consent of the respondents, and therefore, the processing of your personal data is performed in accordance with Article 5(1)(d) of the EUDP Regulation.
  - Processing is necessary:
 

☒ for the performance of a task carried out in the public interest
 ☐ for compliance with a legal obligation to which the Controller is subject
 ☐ for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
 ☐ in order to protect the vital interests of the data subject or of another natural person

Or

☒ Data subject has given his/her informed consent

DATA SUBJECT’S RIGHTS

Information on how to exercise data subject’s rights

Data subjects may exercise their data privacy rights as provided in Articles 17 to 24 of the EUDP Regulation. Data subjects submit their replies in the EU Survey tool anonymously. EIOPA will not be able to link responses to individual data subjects. To exercise your rights with respect to the processing operations managers through the EU Survey tool, please see sections 7 and 8 of the [European Commission’s EU Survey privacy statement](#). Data subjects have the right to:

- access their personal data, receive a copy of them in a structured and machine-readable format or have them directly transmitted to another controller, as well as request their rectification or update in case they are not accurate.
- request the erasure of their personal data.
- withdraw their consent to the processing of their personal data at any time in case such processing is based solely on their consent.

For the protection of the data subjects’ privacy and security, every reasonable step shall be taken to ensure that their identity is verified before granting access, or rectification, or deletion.

Should data subjects wish to access/rectify/delete their personal data, or receive a copy of them/have it transmitted to another controller, please contact [DataController@eiopa.europa.eu](mailto:DataController@eiopa.europa.eu) or [dpo@eiopa.europa.eu](mailto:dpo@eiopa.europa.eu).

Complaint:

Any complaint concerning the processing of the data subjects’ personal data can be addressed to EIOPA’s Data Controller ([DataController@eiopa.europa.eu](mailto:DataController@eiopa.europa.eu)) or EIOPA’s Data Protection Officer ([dpo@eiopa.europa.eu](mailto:dpo@eiopa.europa.eu)). Alternatively, data subjects can also have at any time recourse to the European Data Protection Supervisor ([www.edps.europa.eu](http://www.edps.europa.eu)), as provided in Article 63 of the EUDP Regulation.

CATEGORIES OF DATA SUBJECTS & PERSONAL DATA

Categories of Data Subjects
<input type="checkbox"/> EIOPA Temporary or Contract Agents <input type="checkbox"/> SNEs or trainees <input type="checkbox"/> Visitors to EIOPA (BOS, MB, WG, Seminars, Events, other) If selected, please specify: ..... <input type="checkbox"/> Providers of good or services <input type="checkbox"/> Complainants, correspondents and enquirers <input type="checkbox"/> Relatives and associates of data subjects <input checked="" type="checkbox"/> Other (please specify): members of patient associations
Categories of personal data
<p><b>(a) General personal data:</b>                  The personal data contains:</p> <input type="checkbox"/> Personal details (name, address etc) <input type="checkbox"/> Education & Training details <input checked="" type="checkbox"/> Employment details <input type="checkbox"/> Financial details <input checked="" type="checkbox"/> Family, lifestyle and social circumstances <input type="checkbox"/> Other (please give details): .....
<p><b>(b) Special categories of personal data</b>                  The personal data reveals:</p> <input type="checkbox"/> Racial or ethnic origin <input type="checkbox"/> Political opinions <input type="checkbox"/> Religious or philosophical beliefs <input type="checkbox"/> Trade union membership <input type="checkbox"/> Genetic or Biometric data <input checked="" type="checkbox"/> Data concerning health

CATEGORIES OF RECIPIENTS & DATA TRANSFERS

Recipient(s) of the data
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<input type="checkbox"/> Managers of data subjects <input checked="" type="checkbox"/> Designated EIOPA staff members  If selected, please specify: Designated EIOPA Staff working on the Thematic Review, within EIOPA's Consumer Protection Department.  <input type="checkbox"/> Relatives or others associated with data subjects <input type="checkbox"/> Current, past or prospective employers <input type="checkbox"/> Healthcare practitioners <input type="checkbox"/> Education/training establishments <input type="checkbox"/> Financial organisations <input type="checkbox"/> External contractor <input type="checkbox"/> Other (please specify): .....
Data transmissions and transfer(s)
<input checked="" type="checkbox"/> Other EU institutions/agencies/bodies <input checked="" type="checkbox"/> Other recipients within the EU (e.g. NCAs) <input type="checkbox"/> To third countries If selected, please specify: ..... Whether suitable safeguards have been adopted: <input type="checkbox"/> Adequacy Decision of the European Commission <sup>4</sup> <input type="checkbox"/> Standard Contractual Clauses (SCC) <input type="checkbox"/> Binding Corporate Rules (BCR) <input type="checkbox"/> Administrative Arrangements between public Authorities (AA) <input type="checkbox"/> To international organisations If selected, please specify the organisation and whether suitable safeguards have been adopted: .....

#### AUTOMATED DECISION MAKING

Automated Decision-making, including profiling
A decision is taken in the context of this processing operation solely on the basis of automated means or profiling: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes

<sup>4</sup> Third countries for which the European Commission has issued adequacy decisions are the following: Adequacy decisions (europa.eu)

In case of an automated decision-making or profiling, please explain:

.....

## RETENTION PERIOD & SECURITY MEASURES

### Retention period

How long will the data be retained?

For surveys carried out anonymously, responses will be kept the minimum time required to carry out the survey analysis, as indicated at the beginning of the questionnaire on EU Survey and in the related privacy statement.

The retention period for data handling in the context of an EIOPA thematic review is of five (5) years, from the publication of the report on EIOPA's website., ([Homepage - EIOPA](#)) The earliest foreseen date of publication is December 2026. The data will therefore be retained latest until December 2031. In case the report is published after this foreseen date, the five (5) years will start counting from the moment of publication.

For the data collected via the EU Survey tool, the Commission only keeps personal data for the time necessary to fulfil the purpose of the survey.

For the retention period of cookies and IP addresses used for traffic statistics and analytics by EU Survey, information is available on the Europa Analytics website.

For further processing envisaged beyond the original retention period for historical, statistical or scientific purposes, please specify whether the personal data will be anonymised:

☐ No

☒ Yes

### Technical & organisational security measures taken

Several technical and organisational measures have been adopted in order to ensure the optimum security of the documents and personal data collected in the context of the procedures described under section 'Description and Purpose of the Processing'.

### Security of Processing – detailed analysis

- Please indicate how and where the data processed are stored (e.g. Share Point / cloud):  
EIOPA SharePoint only, restricted and only accessible to the Designated EIOPA staff members working on the Thematic Review within the Consumer Protection Department.
- Technical & Organisational Security measures adopted:
  - ☐ Controlled access to ICT-system/controlled access codes
  - ☐ Restricted access to physical location where data is stored
  - ☐ Pseudonymisation and Encryption
  - ☐ Back-up

- ☐ Audit trails
- ☐ Confidentiality agreement/clause
- ☐ Test the effectiveness of security measures adopted
- ☒ Training of staff
- ☒ Other (please specify): Designated EIOPA staff members working on the Thematic Review within the Consumer Protection Department, EIOPA's Senior Management