

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

### ► Ethics' rules for EIOPA staff members

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#### General information

<b>Introduction</b>
EIOPA, as a European Authority, is committed to protect individuals with regard to the processing of their personal data in accordance with Regulation (EU) No 2018/1725 (further referred to as the "EUDPR") <sup>1</sup> .
<b>Contact Details of Data Controller(s)</b>
Damian Jaworski, Executive Director Westhafenplatz 1, 60327 Frankfurt am Main, Germany <a href="mailto:damian.jaworski@eiopa.europa.eu">damian.jaworski@eiopa.europa.eu</a>
<b>Contact Details of the Data Protection Officer</b>
Alinde Terstegen-Verhaag Westhafenplatz 1, 60327 Frankfurt am Main, Germany <a href="mailto:dpo@eiopa.europa.eu">dpo@eiopa.europa.eu</a>

<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 Processor
EIOPA's Team/Unit/Department responsible for the processing: Legal Unit, EIOPA's Ethics Officer

### Description and Purpose of the Processing

Description of Processing
<p>Personal data are collected and processed in order to enable EIOPA to:</p> <ul style="list-style-type: none"> <li>• Ensure the independence and high standards of professional conduct by all those involved in the activities of EIOPA (i.e. EIOPA staff members, SNEs, contractors and their employees, trainees and study visitors), which is crucial for EIOPA's excellence and reputation;</li> <li>• Identify, handle, remove or mitigate without delay any actual or potential conflict of interests (Col).</li> </ul>
Purpose (s) of the processing
<input checked="" type="checkbox"/> Staff administration <input checked="" type="checkbox"/> Relations with external parties <input checked="" type="checkbox"/> Procurement and accounting <input type="checkbox"/> Administration of membership records <input type="checkbox"/> Auditing <input type="checkbox"/> Information administration <input type="checkbox"/> Other (please give details): .....
Lawfulness of Processing
<ul style="list-style-type: none"> <li>• Legal Basis justifying the processing:             <ul style="list-style-type: none"> <li>- Regulation (EU) No 1094/2010 establishing a European Supervisory Authority (European Insurance and Occupational Pensions Authority) (hereinafter "EIOPA")</li> <li>- Article 5(1)(a) of the EUDPR, i.e. it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority of EIOPA.</li> <li>- Staff Regulations, Title II</li> <li>- Ethics Rules for Staff (EIOPA-MB-20-006-Rev2)</li> <li>- Decision of the Management Board of 13 March 2017 laying down rules on the Secondment of National Experts (EIOPA-MB-17-013)</li> <li>- Procedure on handling gifts received by EIOPA staff of 18 October 2012 (EIOPA-12-351) (Internal whistleblowing is covered in a separate recording.) Processing is necessary:                 <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> for the performance of a task carried out in the public interest</li> <li><input type="checkbox"/> for compliance with a legal obligation to which the Controller is subject</li> <li><input type="checkbox"/> 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</li> <li><input type="checkbox"/> in order to protect the vital interests of the data subject or of another natural person</li> </ul> </li> </ul> </li> </ul> <p>Or</p>

Data subject has given his/her unambiguous, free, specific and informed consent

## Data Subject's Rights

### Information on how to exercise data subject's rights

Data subjects may exercise their data privacy rights provided in Articles 17 to 24 of the EUDPR.

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, as well as object to or obtain the restriction of their processing.

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, or object to/restrict their processing, please contact [Ethicsofficer@eiopa.europa.eu](mailto:Ethicsofficer@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 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)).

## Categories of Data Subjects & Personal Data

### Categories of Data Subjects

- EIOPA permanent staff, Temporary or Contract Agents
- SNEs or trainees
- Visitors to EIOPA (BOS, MB, WG, Seminars, Events, other)  
If selected, please specify: See individuals as listed under Article 1(1) of the Conflict-of-Interests Policy
- Providers of good or services
- Complainants, correspondents and enquirers
- Relatives and associates of data subjects
- Other (please specify): .....

### Categories of personal data

(a) **General personal data:**

The personal data contains:

- Personal details (name, address etc)
- Education & Training details
- Employment details
- Financial details
- Family, lifestyle and social circumstances
- Other (please give details): The personal data processed are those provided by data subjects to the Appointing Authority and the Ethics Officer in fulfilment of their obligations provided in EIOPA's Ethics Framework.

**(b) Special categories of personal data**

The personal data reveals:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic or Biometric data
- Data concerning health, sex life or sexual orientation

## Categories of Recipients & Data Transfers

Recipient(s) of the data

- Managers of data subjects
- Designated EIOPA staff members
  - If selected, please specify:
    - The Appointing Authority (Executive Director);
    - The Ethics Officer (E.O.);
    - The Assistants of the E.O. and the Appointing Authority;
    - Line Managers, Team Leaders and Joint Committee (where relevant);
    - EIOPA's HR Unit;
    - The Advisory Committee on Conflict of Interests (ACCI);
    - Regarding EIOPA's Chair and Executive Director: in addition to the E.O. and his/her Assistant, the Senior Legal Expert, one dedicated member of the Management Board and one of the Board of Supervisors (together the ACCI);
    - EIOPA's Internal Audit Service as well as EIOPA's designated members of the legal unit.
- Relatives or others associated with data subjects
- Current, past or prospective employers
- Healthcare practitioners
- Education/training establishments
- Financial organisations
- External contractor
- Other (please specify):



For the members of the Board of Supervisors: The retention period of declarations of interests is two years after the discharge for the budgetary year to which the declaration of interests relates.

For the members of the Independent Panels: The retention period of the declarations of interests is two years after the discharge for the budgetary year in which the relevant case was closed.”

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'.