



EIOPA-DPO-19-08

**Record of personal data processing  
related to EIOPA's Internal Control processes  
(Art.31(5) Regulation (EU)1725/2018<sup>1</sup>)**

**EIOPA's Data Controller**

The controller responsible for the processing is EIOPA's Executive Director.

Address and email address of the controller:

Westhafenplatz 1, 60327 Frankfurt am Main, Germany

[fausto.parente@eiopa.europa.eu](mailto:fausto.parente@eiopa.europa.eu)

**EIOPA's Data Protection Officer**

Westhafenplatz 1, 60327 Frankfurt am Main, Germany

[dpo@eiopa.europa.eu](mailto:dpo@eiopa.europa.eu)

**External Processor(s) / Joint Controller(s)**

N/A

**Purpose of the processing**

The Internal Control function conducts verifications, assessments and reviews in different areas of EIOPA's activities. In particular, in the course of its control verifications, the Internal Control function has access to all data (including also personal data) held by the EIOPA and the department/unit/team under review and can also request access to the data held by third parties having contractual relations with the latter. Example of such control activities are:

- Audit recommendations follow up and monitoring;
- Sensitive functions assessment and monitoring of the relevant register;

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<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

- Ex-post controls of HR (e.g. recruitment campaigns, P-files, leaves, etc) and financial operations (e.g. contracts, invoices, payments, etc);
- ABAC verification of access rights;
- Exceptions reporting (e.g. examples mentioned above).

The aim of the above operations is not to check whether the information provided by the data subjects is correct but to verify if the processes have been duly followed by EIOPA.

### **Categories of data subjects & Personal data collected**

All necessary data to efficiently conduct a control such as: • Name, • Function, • Grade, • Professional address, • Accounts, • Information coming from local IT system (ABAC) • Minutes from mission, selection committees, and other similar data depending of the nature of the action.

The processed personal data are found for example in P-files, recruitment files, Allegro, requests submitted to HR, contracts with external contractors, invoices, payrolls or bank accounts that are under verification in the context of a given exercise.

### **Recipients of personal data**

- Internal Control Coordinator
- Internal Control Specialist
- Executive Director
- External (European Court of Auditors - ECA) and Internal Auditors (IAS) of EIOPA

### **Transfer of personal data to a third country or international organisation. If so, to which ones and with which safeguards?**

No personal data are sent to a third country or an international organisation in the context of this processing activity.

### **Retention period**

The Internal Control function is granted access to the data which is already saved in EIOPA's system-ERIS or paper files. For the purpose of each control verification, the access to a given set of data shall be granted for the period of 1 year.

### **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. More precisely:

- Paper copies of verified documents are kept in locked cupboards, where access can only have persons authorised on a need-to-know basis;
- Electronic files are stored in EIOPA's document management system with restricted access rights.

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

Data subjects may exercise the data privacy rights provided in Articles 17 to 24 of the Regulation (EU) 1725/2018.

To exercise these rights, please contact: [internal.control@eiopa.europa.eu](mailto:internal.control@eiopa.europa.eu) or [DPO@eiopa.europa.eu](mailto:DPO@eiopa.europa.eu).

For more information on the processing of personal data and on how to exercise the above rights, please refer to EIOPA's Legal Notice: [https://www.eiopa.europa.eu/legal-notice\\_en#PersonalDataProtection](https://www.eiopa.europa.eu/legal-notice_en#PersonalDataProtection)