



EIOPA-DPO-18-025_Rev 1

Record of personal data processing related to EIOPA's Ethics Framework (Art.31(5) Regulation (EU)1725/2018¹)

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

EIOPA's Data Protection Officer

Westhafenplatz 1, 60327 Frankfurt am Main, Germany

dpo@eiopa.europa.eu

External Processor(s) / Joint Controller(s)

N/A

Purpose of the processing

Personal data are collected and processed in order to enable EIOPA to:

- Ensure the independence and high standards of professional conduct by all those involved in the activities of EIOPA (i.e. EIOPA staff, SNEs, contractors and their employees, trainees and study visitors), which is crucial for EIOPA's excellence and reputation;
- Identify, handle, remove or mitigate without delay any actual or potential conflict of interests (CoI).

¹ 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

Categories of data subjects & Personal data collected

The personal data processed are the ones provided by the data subjects in the Declarations they submit to the Appointing Authority and the Ethics Officer in fulfilment of their obligations provided in EIOPA's Ethics Rules, mainly through declaration forms.

Recipients of personal data

The personal data collected could be disclosed to:

- The Appointing Authority (Executive Director);
- The Ethics Officer (E.O.);
- The Assistants of the E.O. and the Appointing Authority;
- Line Managers and Team Leaders (where relevant);
- The Joint Committee (where relevant);
- The Advisory Committee on Conflict of Interests (ACCI);
- EIOPA's HR Unit;
- EIOPA's Internal Audit Service as well as EIOPA's legal team and external lawyers;
- Regarding EIOPA's Chair and Executive Director: in addition to the E.O. and his/her Assistant, the Senior Legal Counsel, one dedicated member of the Management Board and one of the Board of Supervisors (together the ACCI);
- Also, if appropriate, access will be given to the European Ombudsman, the Civil Service Tribunal, the European Court of Auditors and the European Anti-Fraud Office (OLAF).

Declarations of interests of EIOPA's Chairperson and Executive Director are available on EIOPA's website.

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

For temporary, contract agents and seconded national experts, 5 years after the discharge of the last budgetary year in which they worked for EIOPA.

For on-site consultants, interim staff and trainees, 5 years after the discharge of the last budgetary year in which they were involved in EIOPA activities.

In case of a legal challenge, the above dates shall be extended to two years after completion of all relevant proceedings.

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:

- Dedicated folders on EIOPA's internal document management system (ERIS) and outlook where only relevant persons have access on a need-to-know basis.
- Paper folders kept in a lockable cupboard with similar limited 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: ethics@eiopa.europa.eu or 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