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ASSISTANT SUPERVISOR

Mr Pascal LEGAI  
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Brussels, 10 September 2015  
WW/XK/sn/D(2015)1555 C 2014-1095  
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correspondence

**Subject: Prior check Opinion on the allowances for staff members' disabled dependents at the European Union Satellite Centre**

Dear Mr Legai,

We have analysed the notification for prior-checking under Article 27(2)(a) of Regulation 45/2001 (the Regulation) on the processing of personal data in the context of allowances for staff members' disabled dependents at the European Union Satellite Centre (**EU SatCen**).

The EU SatCen's procedure related to allowances for disability is based on specific criteria set out in the agency's Staff Regulations. Applicants should submit their request and medical certificate (mentioning the nature and percentage of the disability) to the Administration Division.

The EDPS notes that the members of the ad hoc board<sup>1</sup> responsible for assessing the applicants' requests for allowances sign a confidentiality declaration stating that they are subject to an obligation of professional secrecy equivalent to that of a health professional and that they will not disclose any information for other purposes for which it was transmitted to them. The two officers in charge of the storage of the personal data processed<sup>2</sup> also sign the same declarations. The signature of such declarations is one of the organisational measures, which may contribute to maintaining the confidentiality of personal data and preventing any

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<sup>1</sup> Head of Finance, a Legal officer and an external medical practitioner.

<sup>2</sup> The EU SatCen explained that due to administrative constraints, the applicants' personal data cannot be stored in the medical files of the staff members which are kept by the external medical provider.

unauthorised access, under Article 22 of the Regulation. Due to the sensitive nature of the data processed, maintain their confidentiality and prevent any unauthorised access is of paramount importance.

On the basis of the notification, the privacy notice and the above documents enclosed, the EDPS considers that the EU SatCen has adopted adequate data protection safeguards in conformity with the Regulation. We have therefore decided to close the case.

Should you have further doubts, please do not hesitate to contact us.

Kind regards,

**(signed)**

Wojciech RAFAŁ WIEWIÓROWSKI

Cc : Ms Esther MOLINERO, Data Protection Officer