



(To be filled out by the EDPS' DPO)

**Register number: 53**

**Date of submission: 03/05/2016**

**Legal basis: Art 25 Regulation 45/2001**

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## NOTIFICATION

### INFORMATION TO BE GIVEN<sup>1</sup>

1/ NAME AND FIRST NAME OF THE CONTROLLER

EDPS

2/ SERVICE RESPONSIBLE FOR PROCESSING PERSONAL DATA

EDPS secretariat

3/ NAME AND DESCRIPTION OF THE PROCESSING OPERATION

The Code of Conduct for the EDPS and Assistant EDPS has been adopted on 16 December 2015. It provides transparency measures that will be applied on three points:

- all meetings (including conferences and missions) of the EDPS and Assistant EDPS
- the management of gifts list
- the management of decorations, prizes and honours list
- the declaration of interests of the Supervisors

4/ PURPOSE(S) OF THE PROCESSING

The transparency measures above mentioned consist:

- in publishing personal data related to the meetings of the EDPS and Assistant EDPS on the EDPS website.
- in keeping a list of gifts offered of a value higher than 50 euros and received, available upon request.
- in publishing the list of all decorations, prizes and honours declared to the Management Board and the Ethics Officer

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<sup>1</sup> Please attach all relevant documents

- the personal information contained in the declaration of interests of the Supervisors, including those of the spouse/partner

5/ DESCRIPTION OF THE CATEGORY(IES) OF DATA SUBJECT(S)

The EDPS, Assistant EDPS, spouses/partners and other people whose data is being processed for the purposes of transparency mentioned above

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA (INCLUDING, IF APPLICABLE, SPECIAL CATEGORIES OF DATA (ARTICLE 10) AND/OR ORIGIN OF DATA)

Relating to the meetings

Names of the meeting participants and organisers, including the EDPS and/or Assistant EDPS, date, location, subject of the meeting

Relating to the list of gifts

Date, name of person receiving/offering the gift, institution, description and approximate value

Relating to the list of decorations, prizes and honours

Date, name of person receiving/offering the prize, honour or decoration, institution, description, amount if financial reward and name of charity which is receiving the financial reward.

Relating to the declaration of interest of the Supervisors

All data referred to in Annex 1 of the code (previous and outside activities, financial interests, real estate assets and data about spouse/partner relevant to assess a potential conflict of interest)

7/ INFORMATION TO BE PROVIDED TO THE DATA SUBJECTS

Personal data related to the invitation to a meeting with the Supervisor, participation in conference or events, gifts offered or received, decorations, prizes and honours received, and the declaration of interests of the Supervisors will be processed in accordance with Regulation (EC) No. 45/2001 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data.

Further to Articles 11 and 12 of this Regulation, the EDPS provides the following information:

**Controller**

The controller is the European Data Protection Supervisor (EDPS) (see contact details at the end).

**Legal basis of the processing operation.**

The Code of Conduct for the EDPS and Assistant EDPS (16 December 2015) and the EDPS Rules of Procedure (17 December 2012)

**Description and purpose of the processing operation.**

- The Code of Conduct for the EDPS and Assistant EDPS provides that transparency measures will be applied to account for all meetings of the EDPS and Assistant EDPS with organisations' representatives or self-employed individuals. These measures consist in publishing personal data related to those meetings on the EDPS website (see below).
- It also provides the obligation of keeping a list of gifts offered of a value higher than 50 euros and received, and which is available upon request.
- It also provides the obligation of publishing on the EDPS website a list of all decorations, prizes and honours received and declared to the Management Board and the Ethics Officer.
- And it also provides the obligation of publishing the declaration of interests of the Supervisors.

#### **Personal data collected and further processed.**

- relating to meetings: names of the meeting participants and organisers, including the EDPS and/or Assistant EDPS, together with the date, location and subject of the meeting, to be published onto the EDPS website.
- relating to the list of gifts: date, name of person receiving/offering the gift, institution, description and approximate value
- relating to the list of decorations, prizes and honours: date, name of person receiving/offering the prize, honour or decoration, institution, description, amount if financial reward and name of charity which is receiving the financial reward
- relating to the declaration of interest of the Supervisors: all data referred to in Annex 1 of the code (previous and outside activities, financial interests, real estate assets and data about spouse/partner relevant to assess a potential conflict of interest)

#### **Recipients of the data**

The general public but also: EDPS DPO, EDPS Director, EDPS Ethics officer, EDPS GECO, IAS and Court of Auditors, Court of Justice where needed and appropriate as indicated in the provisions of the code.

#### **Data retention**

Information relating to the meetings, to the list decorations, prizes and honours received by the EDPS and the Assistant EDPS and to the declaration of interest of the Supervisors will be published on the EDPS website for the whole of the Supervisors' mandate (usually 5 years) and for a further 3 years. Then this information will be deleted from the website and won't be kept anywhere else. Information relating to the list of gifts will be kept for the whole of the Supervisors' mandate (usually 5 years) and for a further 3 years and then will be deleted.

#### **Rights of data subjects (people whose data are processed)**

Data subjects have the right of access and the right to rectify the data concerning them by contacting the EDPS (see below). They may also object to the processing of their personal data if they deem it unlawful.

#### **Right to lodge a complaint**

Data subjects may lodge a complaint with the EDPS DPO ([EDPS-DPO@edps.europa.eu](mailto:EDPS-DPO@edps.europa.eu)) or have recourse to the EDPS as a supervisory authority.

#### **Contact**

EDPS mail box: [edps@edps.europa.eu](mailto:edps@edps.europa.eu)

Postal address: Rue Wiertz 60, B-1047 Brussels, Belgium

8/ PROCEDURES TO GRANT DATA SUBJECTS' RIGHTS (RIGHTS OF ACCESS, TO RECTIFY, TO BLOCK, TO ERASE, TO OBJECT)

People whose data are processed have the right of access and the right to rectify the data concerning them by contacting the EDPS. They may also object to the processing of their personal data if they deem it unlawful.

9/ AUTOMATED / MANUAL PROCESSING OPERATION

Manual processing operation with the use of standard IT tools

10/ STORAGE MEDIA OF DATA

All data related to meetings and to decorations, prizes and honours is kept on the EDPS website.

All data related to lists of gifts is kept in lock cupboards or on computers with passwords

All data related to the declaration of interests of the Supervisors is kept on the EDPS website and in the personal folder of the Supervisors kept under lock in the GECO's office.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

Legal basis: the Code of Conduct for the EDPS and Assistant EDPS (16 December 2015) and the EDPS Rules of Procedure (17 December 2012)

Lawfulness of the processing: Articles 5a of Regulation 45/2001

12/ THE RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE DATA MIGHT BE DISCLOSED

The general public but also: EDPS DPO, EDPS Director, EDPS Ethics officer, EDPS GECO, IAS and Court of Auditors, Court of Justice where needed and appropriate and as provided in the provisions of the code--

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

Information relating to the meetings, to the list decorations, prizes and honours received by the EDPS and the Assistant EDPS and to the declaration of interest of the Supervisors will be published on the EDPS website for the whole of the Supervisors' mandate (usually 5 years) and for a further 3 years. Then this information will be deleted from the website and won't be kept anywhere else. Information relating to the list of gifts will be kept for the whole of the Supervisors' mandate (usually 5 years) and for a further 3 years and then will be deleted.

13 BIS/ TIME LIMITS FOR BLOCKING AND ERASURE OF THE DIFFERENT CATEGORIES OF DATA

*(further to justified legitimate request from the data subject)*

*(Please, specify the time limits for every category, if applicable)*

People whose data are processed may object to the processing of their personal data if they deem it unlawful.

14/ HISTORICAL, STATISTICAL OR SCIENTIFIC PURPOSES

*If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification*

N/A

15/ PROPOSED TRANSFERS OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

N/A

16/ FURTHER INFORMATION

N/A

The data controller declares the accuracy of the above statements and undertakes to notify any change affecting this information to the Data Protection Officer.

PLACE AND DATE: BRUSSELS, 3 MAY 2016

THE CONTROLLER: LEONARDO CERVERA NAVAS