

*(To be filled out in the EDPS' office)*

**REGISTER NUMBER: 1332**

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**NOTIFICATION FOR PRIOR CHECKING**

**DATE OF SUBMISSION: 28/09/2015**

**CASE NUMBER: 2015-0807**

**INSTITUTION: EUROPEAN INVESTMENT FUND**

**LEGAL BASIS: ARTICLE 27-5 OF THE REGULATION CE N° 45/2001<sup>(1)</sup>**

**INFORMATION TO BE GIVEN<sup>2</sup>**

1/ NAME AND ADDRESS OF THE CONTROLLER

European Investment Fund  
37B, avenue J.F. Kennedy  
L-2968 Luxembourg

2/ ORGANISATIONAL PARTS OF THE INSTITUTION OR BODY ENTRUSTED WITH THE PROCESSING OF PERSONAL DATA

Risk Management - EIF Compliance

3/ NAME OF THE PROCESSING

EIF Whistleblowing Policy

4/ PURPOSE OR PURPOSES OF THE PROCESSING

Reporting of process deficiencies, which could create a financial or reputation risk to EIF to an independent internal service within the organisation and disregarding usual hierarchical reporting lines

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

<sup>1</sup> OJ L 8, 12.01.2001.

<sup>2</sup> **Please attach all necessary backup documents**

EIF Staff, including temporary staff and consultants to the extent of the applicability of the EIF Staff Code of Conduct

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA  
(including, if applicable, special categories of data (Article 10) and/or origin of data)

Name of the data subject and information on his/her situation within the organisation, any document or other evidence of efforts to address and/or resolve the identified issue

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

The EIF Whistleblowing Policy is published on the EIF website and regularly explained to EIF Staff in awareness sessions. It aims specifically at the protection of EIF Staff reporting irregularities or, more generally, process deficiencies disregarding usual hierarchical reporting lines to the compliance function in EIF

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS  
(Rights of access, to rectify, to block, to erase, to object)

According to the EIF Whistleblowing Policy, EIF Staff is obliged to report identified process deficiencies to EIF Compliance or EIF Management. The reporting can be made anonymously. The policy includes an obligation of the addressees of the reporting to pursue the reported issue. If the reporting is not made anonymously, the whistleblower receives an acknowledgement of the receipt of his/her reporting with a standard indication of his/her rights under the Regulation 45/2001/EC

9/ AUTOMATED / MANUAL PROCESSING OPERATION

Reporting can be made by all means and through any media as well as orally. Whistleblowers' reports are published manually by EIF Compliance. They are centrally registered. Non-anonymous reports are only registered if the whistleblower expressly consents to a whistleblowing process and its registering as such. Failing such consent, EIF Compliance pursues the report as anonymous whistleblowing report, if the requirements for a whistleblowing report, in particular reporting on process deficiencies with a potential financial or reputation risk for EIF are argued by the report

10/ STORAGE MEDIA OF DATA

Excel register administered by EIF Compliance

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

EIF Statutes, EIF Staff Code of Conduct, EIF Whistleblowing Policy

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

Personal data of whistleblowers must not be disclosed unless with the express documented consent of the data subject concerned

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

Personal data will only retained if the data subject concerned so consents and then for the customary period of five years after the closure of the file

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS  
*(Please, specify the time limits for every category, if applicable)*

Any personal data is restricted

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/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING *(Please describe)*

AS FORESEEN IN:

Article 27.2.(a)

*(Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,)*

Article 27.2.(b)

*(Processing operations intended to evaluate personal aspects relating to the data subject,)*

Article 27.2.(c)

*(Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,)*

Article 27.2.(d)

*(Processing operations for the purpose of excluding individuals from a right, benefit or contract)*

Other (general concept in Article 27.1)

17/ COMMENTS

PLACE AND DATE: LUXEMBOURG, 28/09/2015

DATA PROTECTION OFFICER: JOBST NEUSS

INSTITUTION OR BODY: EUROPEAN INVESTMENT FUND