

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

**NOTIFICATION FOR PRIOR CHECKING**

**DATE OF SUBMISSION: 04/07/2016**

**CASE NUMBER: 2016-0614**

**INSTITUTION: EIB**

**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 Bank  
98-100 Bd. Konrad Adenauer,  
L -2950 Luxembourg

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

EIB CS/Personnel Operations/Occupational Health Centre (OHC)

3/ NAME OF THE PROCESSING

OHC Pregnancy Self-Assessment Data

4/ PURPOSE OR PURPOSES OF THE PROCESSING

Duty of Care as employer - to assess any existing degree of risk during pregnancy and to advise appropriately in the context of the working environment.

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

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

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

EIB women employees

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

- Name, age, Staff ID, Name of Gynecologist/Obstetrician
- Details of current post, missions, hours worked, commute, stress levels,
- Medical details relating to the pregnancy

*See Annex 1 "Police on Pregnancy" to be approved*

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

Police on Pregnancy will be published and available through the Intranet. Data subject will be informed that their personal data will be processed respecting Regulation 45/2001 terms, and that the procedure have already been cleared by the EDPS. They will be also informed that they may lodge a complaint to the EDPS or a consultation to the DPO.

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

Data subjects are entitled to access, rectify , block, erasure or object the processing of their personal data through the OHC. In case of doubts or difficulties, the DPO and or the EDPS can be consulted.

9/ AUTOMATED / MANUAL PROCESSING OPERATION

Manual.

10/ STORAGE MEDIA OF DATA

Paper based medical records

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

Staff Rules, article 7

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

OHC staff

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

Member of staff medical data originating from the OHC itself or from external providers of services will be kept on file for the duration of the member of staff's employment at the bank. Records older than 10 years will be kept by the bank's central archives, rather than at the OHC. However, only OHC authorised personnel will have access to these files

At the end of employment, a staff member may request, in writing, to have a copy of his medical record forwarded to a physician of his choice. The original medical record will be kept at the Bank's central archive for a period of 30 years upon termination of employment. This period is fixed and is not affected by the death of the data subject.

Records pertaining to the management of the OHC, such as e.g. timetables of reservations, will be kept for a period of five years. Only OHC authorised personnel have access to such data.

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS

15 working days

14/ HISTORICAL, STATISTICAL OR SCIENTIFIC PURPOSES

Not applicable

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

NONE

16/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING

AS FORESEEN IN:

↑ Article 27.2.(a)

*Processing of data relating to health (...),*

↑ Article 27.2.(b)

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

↑ Other (general concept in Article 27.1)

17/ COMMENTS

On the basis of the information provided and/or on request, OHC medical staff will provide advice for staff on ergonomics, and advice pertinent to each individual case and situation relating to their pregnancy in the workplace

PLACE AND DATE: 4 JULY 2016

DATA PROTECTION OFFICER: ALBERTO SOUTO DE MIRANDA

INSTITUTION OR BODY: EUROPEAN INVESTMENT BANK