

Annual Report

2012

Executive Summary



EUROPEAN DATA
PROTECTION SUPERVISOR



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Luxembourg: Publications Office of the European Union, 2013

ISBN 978-92-9242-005-5

doi:10.2804/53812

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Printed in Belgium

PRINTED ON ELEMENTAL CHLORINE-FREE BLEACHED PAPER (ECF)

INTRODUCTION

This is the Executive Summary of the 2012 Annual Report on the activities of the European Data Protection Supervisor (EDPS). This report covers 2012 as the ninth year of activity of the EDPS as an independent supervisory authority, tasked with ensuring the fundamental rights and freedoms of natural persons, and in particular their privacy with regard to the processing of personal data, are respected by EU institutions and bodies. It also covers the fourth year of the shared mandate of Peter Hustinx, EDPS and Giovanni Buttarelli, Assistant Supervisor as members of this authority.

The European Data Protection Supervisor was established under Regulation (EC) No. 45/2001 (henceforth the "Regulation"),¹ to protect personal information and privacy and promote good practice in the EU institutions and bodies. Our mission is to:

- **monitor** and **ensure** the protection of personal data and privacy when EU institutions and bodies process the personal information of individuals;
- **advise** EU institutions and bodies on all matters relating to the processing of personal information. We are consulted by the EU legislator on proposals for legislation and new policy development that may affect privacy;
- **monitor** new technology that may affect the protection of personal information;
- **intervene** before the EU Court of Justice to provide expert advice on interpreting data protection law;
- **cooperate** with national supervisory authorities and other supervisory bodies to improve consistency in protecting personal information.

Special efforts were made this year to improve the efficiency and effectiveness of our organisation in the present climate of austerity. In this context, we completed a comprehensive Strategic Review with the help of our internal and external stakeholders, which resulted in clear objectives for 2013-2014, the adoption of internal Rules of Procedure covering all EDPS activities, and the adoption of an Annual Management Plan. As a result the institution reached full maturity in 2012.

In the course of 2012, we once again set new benchmarks in different areas of activity. In the supervision of EU institutions and bodies processing personal data, we interacted with more data protection officers in more institutions and bodies than ever before. In addition, we saw the effects of our new enforcement policy: most EU institutions and bodies, including many agencies, are making good progress in complying with the Data Protection Regulation, although there are still some which should increase their efforts.

In the consultation of new legislative measures, we issued a record number of opinions on a wide range of subjects. The Review of the EU legal framework for data protection was at the top of our agenda. However, the implementation of the Stockholm programme in the area of freedom, security and justice and the Digital Agenda, as well as issues in the internal market, such as financial sector reform and in public health and consumer affairs, also had an impact on data protection. We also increased our cooperation with other supervisory authorities.

¹ Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 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 (OJ L 8, 12.1.2001, p. 1).

2012 HIGHLIGHTS

The main activities of the EDPS in 2012 continued to grow both in scale and scope at the same time, however, as resources were effectively reduced in the light of budget constraints.

Vision and methodology

The Strategic Review announced in the last Annual Report was completed and the resulting Strategy for 2013-2014 articulates the vision and the methodology required to improve our capacity to work effectively and efficiently in a climate of austerity. The Strategy was complemented by the adoption of the Rules of Procedure, which set out in a single, comprehensive document the organisation and working procedures of the institution, and an Annual Management Plan, the foundation for planning activities and managing the workload. All three documents are closely integrated. Thus, the core values and guiding principles articulated during the Strategic Review are enshrined in Article 15 of the Rules of Procedure, and the actions underpinning the new Strategy for 2013-2014 are implemented in the Annual Management Plan for 2013.

Data Protection Officers

In May 2012, as part of our efforts to support the work of DPOs, we launched a survey in the form of a questionnaire on the status of DPOs. The conclusions of this exercise were compiled into a report which highlights a number of positive outcomes, but also some areas of concern which we intend to monitor closely.

Prior checking

In 2012, we received 119 notifications for prior checking and adopted 71 prior checking opinions. After careful analysis, 11 cases were not subject to prior checking. In contrast to previous years where large EU institutions had been frequent addressees, in 2012, we addressed the majority of our opinions to EU agencies and bodies. In general the opinions adopted in 2012 covered standard administrative procedures such as staff evaluation and processing of health data, but also core business activities such as processing operations related to asset freezing activities at the Commission, revised OLAF investigation procedures and annual declarations of interest. In the follow up of EDPS opinions, we were pleased to be able to close 92 cases in 2012.

Visits

In 2012, we visited six agencies where there was a suspected lack of engagement in compliance or a lack of communication between the agency and the EDPS. These visits proved to be very effective in raising awareness and committing management to respect the Regulation. We inspected 15 EU institutions or bodies and followed-up previous inspections.

Scope of Consultation

Following the trend of previous years, 2012 saw our consultation work on legislation increase with an all-time high of 33 opinions, 15 formal comments and 37 informal comments issued.

The importance of data protection continues to grow: apart from the usual priorities in the Area of Freedom, Security and Justice (AFSJ) and international data transfers, opinions on the internal market and the health sector became increasingly common in 2012. In the meantime, the rapid developments in the area of the Digital Agenda are mirrored by an influx of related legislative proposals.

Review of the data protection legal framework

In response to the proposal on the reform package² comprised of a regulation and a directive, published in January, we issued an opinion in March. Thereafter, we continued to highlight potential areas of concern and possible improvements in speeches, press releases and other forums throughout the year.

Digital agenda and technology

In the digital agenda and technology domain, we published an opinion on cloud computing. The impact of new technology is – and will continue to remain – of the utmost importance in this area and pinpoints the need for the implementation of data protection principles such as *privacy by design* and *privacy by default*.

2 http://www.edps.europa.eu/EDPSWEB/edps/Consultation/Reform_package

Public health and consumer affairs

In public health and consumer affairs, we observed a growing trend to fuse new digital technologies with existing practices to improve the quality of service. These efforts are commendable and personalised care and services have great potential. However, given the sensitivity of personal health data, consumer trust in new services can only be fostered and maintained when fundamental data protection principles are respected.

Cooperation with data protection authorities

The EDPS and the Article 29 Working Party collaborated on a wide range of subjects, particularly for the opinions on purpose limitation and compatible use, smart grid data protection impact assessment templates and open data, where the EDPS acted as the rapporteur. We also made significant contributions to the opinions adopted on the data protection reform discussions, cloud computing, cookie consent exemption and developments in biometric technologies.

Coordinated Supervision

The EDPS provided the data protection authorities involved in the coordinated supervision of EURODAC and the Customs Information System with an efficient secretariat. Moreover, the new **Visa Information System (VIS)** Supervision Coordination Group held its first meeting in November 2012. Primarily tasked with overseeing the ongoing, gradual roll-out of the system and to facilitate cooperation among Member States, the Group discussed its first working program and shared information on EDPS activities and national inspections in different Member States.

Internal organisation

In 2012, a new sector, IT Policy, was introduced in the organisation, to develop and concentrate our expertise in information technology and data protection. The sector is made up of IT experts with experience in practical IT issues and in policy and supervision. It improves our ability to assess the privacy risks of new technologies, liaise with the technology experts of other data protection authorities and offer guidance on the principles of *privacy by design* and *privacy by default* to data controllers. It also ensures that we can develop our supervision methods and tools in line with technological evolution, in particular with regard to large-scale information systems that are subject to coordinated supervision. The sector will also support the development of a more coherent internal IT policy for the institution.

Resource management

Further to quarterly budget implementation reviews involving the Management Board of the institution, the implementation of our budget increased from 75.66% in 2010, to 90.16% in 2012. New IT tools such as Sysper2 (HR) and MIPs (mission management) have led to increasing efficiency and professionalisation of the EDPS HR function.

Some EDPS key figures in 2012

- **71 prior check opinions adopted, 11 non prior check opinions**
- **86 complaints received, 40 admissible**
- **27 consultations received on administrative measures**
- **15 on-the-spot inspections and 6 visits carried out**
- **1 set of Guidelines published on processing of personal information in the area of leave and flexitime**
- **33 legislative opinions issued** on, among others, initiatives relating to the Area of Freedom, Security and Justice, technological developments, international cooperation, data transfers, public health or internal market.
- **15 sets of formal comments issued** on, among others, intellectual property rights, civil aviation security, EU criminal policy, the Terrorist Finance Tracking System, energy efficiency, or the Rights and Citizenship Programme.
- **37 sets of informal comments issued**

SUPERVISION AND ENFORCEMENT

One of the main roles of the EDPS is to supervise in an independent manner, the processing operations carried out by European institutions or bodies. The legal framework is the Data Protection Regulation (EC) No 45/2001, which establishes a number of obligations for those who process data, along with a number of rights for those whose personal data are processed.

Supervisory tasks range from advising and supporting data protection officers through prior checking of risky data processing operations, to conducting inquiries, including on-the-spot inspections and handling complaints. Further advice to the EU administration can also take the form of consultations on administrative measures or the publication of thematic guidelines.

Our strategic objective

Promote a 'data protection culture' within the EU institutions and bodies so that they are aware of their obligations and accountable for compliance with data protection requirements.

Data Protection Officers

All EU institutions and bodies must have at least one **data protection officer** (DPO). In 2012, eleven new DPOs were appointed, both in existing institutions and bodies and new agencies or joint undertakings, bringing the total number of DPOs to 58. Regular interaction with them and their network is an important condition for effective supervision. The EDPS has worked closely with the 'DPO quartet' composed of four DPOs (Council, European Parliament, European Commission and the European Food Safety Agency) who coordinate the DPO network. The EDPS attended the DPO meetings held in March 2012 at the European Chemicals Agency (ECHA) in Helsinki and at the European Central Bank in November.

Prior checking

Regulation (EC) No 45/2001 provides that all processing operations of personal data likely to present specific risks to the rights and freedoms of data subjects are to be the subject of prior checking by the EDPS. The EDPS then determines whether or not the processing complies with the Regulation.

Prior checking of risky processing operations continued to be an important aspect of supervision. In 2012, we received 119 notifications for prior checking (2 were withdrawn). Whilst we have cleared the backlog of *ex-post* prior checks for most EU institutions, processing operations put in place by EU agencies, in particular by newly established ones, the follow-up of Guidelines issued as well as several visits to agencies in 2012 have generated an increase in the number of notifications. In 2012, we issued 71 prior checking opinions and 11 opinions on 'non-prior checks'. These figures take into account that we dealt with a significant number of cases by issuing joint opinions: in 2012, we issued 13 joint opinions responding to a total of 41 notifications.

Monitoring compliance

In our policy paper of December 2010, the EDPS announced that "he will continue to conduct periodic "surveys" in order to ensure that he has a representative view of data protection compliance within EU institutions/bodies and to enable him to set appropriate internal objectives to address his findings". In May 2012, we launched a survey dedicated to the Data Protection Officer (DPO) in order to monitor the compliance of EU institutions and bodies with Article 24 of the Regulation. While we are delighted to report that the DPO function is well established within the EU administration, there are several areas of concern. In particular, we will closely monitor the actual duration of the mandate of those DPOs who are contract staff, the high DPO turnover, the possible conflicts of interest, particularly for part-time DPOs attached to the administration. Where appropriate, we will address such issues on a case by case basis.

In June 2012, we launched a survey in the form of a questionnaire on the function of Data Protection Coordinator (DPC) at the European Commission. The results of the survey will be compiled into a report, to be issued in 2013.

Complaints

One of the main duties of the EDPS, as established by the Data Protection Regulation, is to hear and investigate complaints as well as to conduct inquiries either on his own initiative or on the basis of a complaint.

In 2012, the EDPS received 86 complaints (a decrease of approximately 20% compared to 2011, confirming the effectiveness of the online complaint submission form available on our website in reducing the number of inadmissible complaints). Of these, 46 complaints were inadmissible prima facie, the majority relating to processing at national level as opposed to processing by an EU institution or body.

The remaining 40 complaints required in-depth inquiry (an increase of about 54% compared to 2011). In addition, 15 admissible complaints, submitted in previous years (four in 2009, three in 2010 and eight in 2011), were still in the inquiry, review or follow-up phase on 31 December 2012.

Consultation on administrative measures

On 23 November 2012, we issued a policy on consultations in the field of supervision and enforcement to provide guidance. Further work was also done in response to **consultations on administrative measures** by EU institutions and bodies in relation to the processing of personal data. A variety of issues were addressed, including billing users of fixed phone calls made for non-work related purposes, internet publication of the official directory of EU agents, collection of certificates from contract agents, contractual clauses to be used in Administrative Cooperation Agreements and the transfer of medical data between institutions.

Horizontal guidance

In 2012, we issued Guidelines on managing the processing of personal information in **leave and flexitime procedures**. We organised training for DPCs, workshops for controllers, a dedicated area for DPOs on the EDPS website and a telephone helpline for DPOs. We also issued our Follow-up Report outlining the status of compliance of European institutions and bodies with the Video-Surveillance Guidelines issued by the EDPS in March 2010.

We are currently working on Guidelines for absences and leave, procurement and selection of experts, e-monitoring and data transfers.

POLICY AND CONSULTATION

The EDPS advises the European Union institutions and bodies on data protection issues in a range of policy areas. This consultative role relates to proposals for new legislation as well as other initiatives that may affect personal data protection in the EU. It usually takes the shape of a formal opinion, but the EDPS may also provide guidance in the form of comments or policy papers.

Our strategic objective

Ensure that the EU legislator (Commission, Parliament and Council) is aware of data protection requirements and integrates data protection in new legislation.

Major trends

2012 was a year of major developments in the field of data protection. The Commission continued to publish a large number of legislative proposals affecting data protection, with a comprehensive reform of the existing data protection rules as the main theme. This project featured high on the EDPS agenda in 2012 and will remain so as the legislative procedure advances.

In 2012, there was a steady increase in the number of opinions we issued. We issued 33 opinions, 15 formal comments and 37 informal comments on a variety of subjects. With these and other interventions, we implemented our priorities for 2012, as outlined in our inventory.

Following the trend of past years, the areas covered by EDPS opinions has continued to diversify. Aside from traditional priorities, such as the further development of the Area of Freedom, Security and Justice (AFSJ) or international data transfers, new fields are emerging. A number of opinions in 2012 focused on the digital market and consumer safety in the online environment. Among those, the topics of personal health data and personal credit information stood out.

EDPS opinions and key issues

On 25 January, the Commission adopted its reform package, comprising two legislative proposals: a general Regulation on data protection and a specific Directive on data protection in the area of police and justice. Our first reaction was to welcome the general Regulation as a huge step forward for data protection in Europe. On 7 March, we adopted an opinion elaborating our position on both proposals in greater detail. In a public statement, the EDPS concluded that the two legislative proposals would still leave Europe far removed from a comprehensive set of data protection rules – both at national and EU level – in all areas of EU policy.

In 2012, we also published an opinion on **cloud computing** to emphasise data protection principles and the importance of their correct implementation in this prominent phenomenon. In it, we detailed and justified the necessary standards for data protection in the cloud. Such opinions are intended to provide guidance and become benchmark references for upcoming hot topics and data protection issues.

The progressing **interoperability** of sophisticated **consumer technology** and **the internet** (smart devices for instance), presents new challenges in limiting the processing of personal information to the purposes for which it was collected. Access to restricted information or utilising formerly irrelevant or inaccessible data for new purposes has been at the core of some of our recent work. The opinion on smart meters, devices which can enable significant energy savings yet potentially also imply a form of domestic surveillance, is an example of a proposal we commented on that illustrates this trend.

In the **Area of Freedom, Security and Justice** (AFSJ), the question of necessity has been a recurrent theme. We have issued several opinions in which this data protection principle figured prominently. This was the case for our opinions on EURODAC, SIS II and the European Cybercrime Centre. We are acutely aware of the trend for law enforcement agencies to argue for increased access to other databases, such as those used by customs and immigration, for crime prevention purposes.

Opinions related to the **internal market** also continued to feature prominently in 2012 with an additional emphasis on the digital market. We adopted, amongst others, a package of four opinions in the field of the financial market regulation.

Court cases

No EDPS decisions were challenged before the Court of Justice of the EU in 2012 and we did not instigate any proceedings against other EU institutions or bodies. The court ruled on two cases in which we acted as an intervening party.

The first ruling dealt with the alleged lack of independence of the Austrian data protection authority, the Datenschutzkommission (DSK). In *Commission v. Austria* (Case C-614/10), we intervened in support of the Commission. In its ruling of 16 October 2012, the Court concluded that the Austrian DSK did not fulfil the requirements of independence as outlined in the data protection Directive.

The second case in which we were involved was *Egan and Hackett v. European Parliament* (Case T-190/10). The two

applicants in this case requested public access to two documents relating to the applications for parliamentary assistance allowance of two MEPs in which names of assistants were mentioned. The Parliament refused to grant access on the grounds that the names constituted personal information, the disclosure of which would infringe the privacy interests of the individuals concerned. In its ruling of 28 March 2012, the Court annulled the refusal, as the Parliament had failed to show to what extent the disclosure of documents containing the names of former MEP assistants would specifically and effectively undermine their right to privacy.

We also requested leave to intervene in two other cases which are still pending at the time of writing: the first case is another infringement action concerning the independence of data protection authorities, this time against Hungary (Case C-288/12). The second pending case is *ZZ v. EIB*, before the Civil Service Tribunal (Case F-103/11). During an internal harassment investigation conducted by the EIB, the full complaint on the alleged harassment, including the associated documents (which included medical declarations) was sent to those accused of the harassment. The EDPS intervened in support of the applicant in as far as the claim was based on an alleged breach of data protection rules.

COOPERATION

The EDPS cooperates with other data protection authorities in order to promote consistent data protection throughout Europe. This cooperative role also extends to cooperation with supervisory bodies established under the former EU "third pillar" and in the context of large-scale IT systems.

Our strategic objective

Improve the good cooperation with Data Protection Authorities, in particular the Article 29 Working Party, to ensure greater consistency of data protection in the EU.

The Article 29 Working Party is composed of representatives of the national data protection authorities (DPAs), the EDPS and the Commission (the latter also provides the secretariat for the Working Party). It plays a central role in ensuring the consistent application of Directive 95/46/EC.

In 2012, we actively contributed to the activities of the Working Party, in particular, through participation in thematic subgroups such as: Borders, Travel and Law Enforcement, eGovernment, Financial Matters, Future of Privacy, International transfers, Key Provisions and Technology. In addition, we made significant contributions to the opinions adopted in 2012, particularly: data protection reform discussions (two opinions), cloud computing³, cookie consent exemption and developments in biometric technologies.

We have also been acting as a rapporteur or co-rapporteur for the opinion on purpose limitation and compatible use (Key Provisions subgroup); the opinion on smart grid data protection impact assessment template (Technology subgroup); and the opinion on open data (eGovernment subgroup). All three opinions are expected to be adopted in early 2013.

In addition to the Article 29 Working Party, the EDPS continued his close cooperation with the authorities established to exercise **joint supervision on EU large-scale IT systems**.

An important element of these cooperative activities is **EURODAC**. The EURODAC Supervision Coordination Group is composed of representatives of the national data protection authorities and the EDPS. We also provide the secretariat for the Group and as such, we organised two meetings

in Brussels in 2012, one in June and one in November. One of the group's significant achievements of the year was the standardised inspection plan for EURODAC National Access Points (NAPs), adopted at the meeting in November. The purpose of the questionnaire is to assist in national inspections.

A similar arrangement governs the supervision of the **Customs Information System (CIS)**, in the context of which the EDPS convened two meetings of the CIS Supervision Coordination Group in 2012 (in June and December). In the June meeting, the group in cooperation with the Customs JSA, adopted a joint opinion on the FIDE handbook and the activity report for the preceding two years. In the December meeting, the EDPS presented the key points of the follow-up of OLAF prior checks, which was followed by a presentation by the Commission (OLAF) on recent developments in the impact assessment of the amendment of Council Regulation 515/97 and technical developments of the CIS.

The **Visa Information System (VIS)** is a database of information, including biometric data, on visa applications by third country nationals. In November 2012, we hosted the first meeting of the VIS Supervision Coordination Group. The Group comprises national DPAs and the EDPS and is tasked with overseeing the gradual roll-out of the system, to look into any issues such as those relating to the outsourcing by Member States of common tasks to external providers and to share national experiences.

Cooperation in **international fora** continued to attract attention, especially the European and International Conferences of Data Protection and Privacy Commissioners. In 2012, the European Conference was held in Luxembourg and focused on recent developments in the modernisation of the data protection frameworks of the EU, the Council of Europe and the OECD. The International Conference was held in Uruguay in October on the general theme, *Privacy and Technology in Balance*, with a particular emphasis on emerging countries and issues relating to *profiling* and *big data*.

In our function as an observer with the right to intervene, the EDPS attended two meetings of the Consultative Committee of Convention 108 in 2012, one in September and one in November.

On 8-9 November 2012 in Brussels, the World Customs Organisation (WCO) organised the 4th International Workshop on data protection in international organisations with our support. The workshop assembled professionals from EU institutions and bodies and international organisations to discuss and share best practice. Several panels moderated by representatives of both the EDPS and the WCO took place over the two day event.

3 Opinion 05/2012 on Cloud Computing – WP 196, 01.07.2012

MAIN OBJECTIVES FOR 2013

The following objectives have been selected for 2013 within the overall Strategy for 2013-2014. The results will be reported in 2014.

Supervision and enforcement

Ex post prior checks

The phase of accepting *ex-post* notifications is now coming to an end, as we consider that EU institutions and bodies have had sufficient time to notify their existing processing operations to us since the EDPS was established in 2004. To this end, the EDPS wrote to the EU institutions and bodies in July 2012 to set a deadline of June 2013 for notifications of all *ex-post* prior checks. This is expected to give rise to an increase in our workload in the first half of 2013.

Guidance and training

The introduction of the concept of accountability in the data protection framework implies that EU administrations will have to take all necessary measures to ensure compliance. The EDPS believes that DPOs and DPCs play a significant role in any accountability programme. To support their work, we will continue to provide guidance and training and encourage close contacts with the DPO network.

Closer dialogue with EU institutions

As part of Objective 1 of our 2013-2014 Strategy we will maintain our close contact and dialogue with EU institutions to encourage a better understanding of the institutional context and promote a pragmatic and practical application of the regulation. This dialogue could take a number of forms, most notably workshops on a particular theme, meetings or conference calls.

General stock taking exercises

The EDPS intends to launch a new stock taking exercise across all EU institutions and bodies. This is part of a regular exercise whereby we request written feedback on certain indicators of compliance against the respective obligations. The findings of this survey will serve to identify those institutions which lag behind in their compliance programme and to address any identified shortcomings.

Visits

We will continue in our efforts to raise awareness at all levels of management and we will make use of our enforcement powers where necessary. We will visit those bodies that fail

to communicate with us adequately or demonstrate a clear lack of engagement in complying with the data protection regulation.

Inspections

We intend to further define our inspection policy and to fine-tune the procedure surrounding the inspection process. We will continue to carry out targeted inspections not only in those areas where we have offered guidance but also when we wish to check the status.

Policy and consultation

The main objective of our advisory role is to ensure that the EU legislator is aware of data protection requirements and integrates data protection in new legislation and sets forth the actions we have designed to achieve this objective. We face the challenge of fulfilling our increasing role in the legislative procedure and extending timely and authoritative advice with increasingly limited resources. In light of this, we have used our inventory of policy issues to select issues of strategic importance that will form the cornerstones of our consultation work for 2013 (the inventory and accompanying note are published on our website).

Towards a new legal framework for data protection

We will give priority to the ongoing review process on a new legal framework for data protection in the EU and will continue to contribute to the debates in the next steps of the legislative procedure where necessary and appropriate.

Technological developments and the Digital Agenda, IP rights and Internet

Technological developments, especially those connected to the internet and the associated policy responses will be another area of our focus in 2013. Subjects will include a Pan-European framework for electronic identification, authentication and signature, the issue of internet monitoring (such as the enforcement of IP rights and takedown procedures) to cloud computing services.

Further developing the Area of Freedom, Security and Justice

Relevant upcoming proposals include the establishment of a European Public Prosecutor's Office to fight against crimes affecting the EU budget and the reform of EUROJUST. We will also continue to follow those initiatives carried over

from last year such as the EUROPOL reform and the package on smart borders. We will also closely monitor negotiations with third countries on data protection agreements.

Financial sector reforms

We will continue to follow and scrutinise new proposals for the regulation and supervision of financial markets and actors insofar as they affect the right to privacy and data protection. This is all the more important as a growing number of proposals to harmonise and centrally supervise the financial sector are being put forward.

eHealth

In light of a growing trend to incorporate digital technologies when providing health care services, the establishment of clear rules regarding the use of personal information within that framework is paramount, especially given the sensitive nature of health data. We will follow developments in this area and intervene where appropriate.

Other initiatives

We envisage publishing so called *prospective opinions* intended to provide valuable input to the future dissemination of fundamental data protection principles and concerns in other EU policy areas such as competition and trade.

Cooperation

We will pay particular attention to fulfilling the 2013-2014 Strategy concerning cooperation with other data protection authorities, international organisations and our responsibilities in the field of coordinated supervision.

Coordinated supervision

We will continue in our role in the coordinated supervision of EURODAC, CIS and VIS. The second generation Schengen Information System (SIS II) will also be subject to coordinated supervision; its go-live is scheduled for 2013. We will also carry out inspections of the central units of these systems where necessary or legally required.

Cooperation with data protection authorities

We will continue to actively contribute to the activities and success of the Article 29 Working Party, ensuring consistency and synergy between it and the EDPS in line with our respective priorities. We will also maintain our good relationships with national DPAs. As rapporteur for some specific dossiers, we will steer and prepare the adoption of Working Party opinions.

Data protection in international organisations

The EDPS will, therefore, continue to reach out to international organisations through an annual workshop which aims to raise awareness and exchange good practice.

Other fields

Information and communication

In line with our Strategy 2013-2014, the EDPS will continue to raise awareness of data protection within the EU administration, but also in our efforts to inform individuals of their fundamental rights to privacy and data protection. This will include: updating and further developing our website; developing new communication tools to make core activities more visible; using straightforward language to make technical issues more accessible, together with examples with which the general public can easily identify.

Resource management and professionalising the HR function

In the framework of economic austerity and the need 'to do more with less', the strategy of quality management will be developed to allow the institution to fulfil its tasks in the most efficient way. This will include:

- a specific emphasis on a new training policy, in order to foster professional skills, promote career development and improve performance;
- renewed efforts on better planning, performance and monitoring of the spending of financial resources;
- a more strategic approach to human resources management;
- a total quality management system which will be developed and implemented with clear links between Internal Control Standards, Risk Management and the Common Assessment Framework.

We will also launch a strategic reflection on mid and long-term resource needs, in particular in the context of the future European Data Protection Board.

Information technology infrastructure

Over the course of the year we aim to go-live with our new case management system, to deliver results along the desired timeline, with due regard to the necessary security and data protection safeguards.

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Luxembourg: Publications Office of the European Union

2013 – 12 pp. – 21 x 29.7 cm

ISBN 978-92-9242-005-5

doi:10.2804/53812

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