

REGISTER NUMBER: 520

NOTIFICATION FOR PRIOR CHECKING

Date of submission: 16/7/2009

Case number: 2009-475

Institution: ECDC

Legal basis: article 27-5 of the regulation CE 45/2001⁽¹⁾

(1) OJ L 8, 12.01.2001

Notification no.: 2009-DPO-10

Data received:15-07-2009

(2) Please attach all necessary backup documents

1/ Name and adress of the controller

Daniel Catalan, Country information officer. Tomtebodavagen 11 A SE 17183 Stockholm,
Daniel.Catalan@ecdc.europa.eu

2/ Organisational parts of the institution or body entrusted with the processing of personal data

Governance, Director's Cabinet

3/ Name of the processing

Annual Declaration of Interest

4/ Purpose or purposes of the processing

In the article 19 of the ECDC Founding Regulation it is stated that Management Board and Advisory Forum Members shall make a declaration of interests indicating either the absence of any interests which might be considered prejudicial to their independence or any direct or indirect interests which might be considered prejudicial to their independence.

5/ Description of the category or categories of data subjects

The data subjects are either Management Board or Advisory Forum members.

The data is collected from the subject himself.

6/ Description of the data or categories of data including, if applicable, special categories of data (article 10) and/or origin of data)

The data collection started when ECDC was created in 2005 and every year in January, an email is sent to all the MB and AF members asking them to fill and sign the "declaration of interest" form. When a new member is nominated, automatically he/she receives the form to be signed. The information that is collected is as follows: type of membership, and according to the last 3 years, the following information: direct interest (financial benefits arising, contracted work, etc.), participation into activities supported by grants or contracts concluded in the Framework of the Public Health Programme, indirect financial interests e.g. grants, sponsorships, etc., interests deriving from the professional activities of the member or his/her close family Members, any membership role or affiliation that yo have in organisations/bodies/club with an interest in the work of the Centre and other interests or facts that the undersigned considers pertinent.

In each specific meeting, data subjects need to sign another declaration of interest for any agenda point. It is normally signed in the beginning of the meeting and the hard copies are collected in the governance office.

Data likely to present specific risks may include data intended to evaluate personal aspects relating to the data subject: the procedure of screening and detecting conflict of interests fall under provision of art. 27.2.b of Regulation (CE) 45/2001.

7/ Information to be given to data subjects

A Privacy Statement has been included in the Declaration of interest form.

8/ Procedures to grant rights of data subjects(*rights of access, to rectify, to block, to erase, to object*)

Data subjects can access online to their latest declaration. They can contact Governance at any time to rectify the data.

9/ Automated / Manual processing operation

The declaration is manually filled and the template is normally sent by email to the member.

10/ Storage media of data

The files are stored in hard copies in the Governance office. They are also published in the ECDC web

11/ Legal basis and lawfulness of the processing operation

Legal basis (Treaty, Regulation, Decision, etc.) for this processing operation are:
Art. 19.2 of the ECDC founding Regulation 851/2004, Internal procedure on guidance on conflict of interest (ECDC/ADM/006)

12/ The recipients or categories of recipient to whom the data might be disclosed

Following the principle of transparency, the Declarations of interest are published in ECDC web site.

13/ retention policy of (categories of) personal data

Data are kept for up to 7 years (corresponding to 5 years after budget discharge, in n+2)

**13 a/ time limits for blocking and erasure of the different categories of data
(on justified legitimate request from the data subject)
(Please, specify the time limits for every category, if applicable)**

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,

15/ Proposed transfers of data to third countries or international organisations

The data is published on the web and it is available to general public.

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)

Article 27.2.(d)

Other (general concept in Article 27.1)

17/ Comments

PLACE AND DATE: Stockholm (Sweden), 15/07/2009

DATA PROTECTION OFFICER: Elisabeth Robino **SIGNATURE:**

INSTITUTION OR BODY: European Centre for Disease Prevention and Control (ECDC)