

From: [REDACTED]

To: [REDACTED]

CC: [REDACTED]

European Data Protection Supervisor
<EDPS@edps.europa.eu>; [REDACTED]

Sent at:

03/04/20 16:32:10

Subject:

Closure of case 2015-0633

Dear [REDACTED],

First, apologies for my late reply. I hope you are all doing well despite the circumstances.

Thank you for providing us with the updated documents. Concerning [recommendation 16 and 21](#), we are pleased to see that our comments have been introduced and these recommendations are therefore closed.

Regarding [recommendation 24](#), the EDPS takes note of the fact that D@W documents are covered by section 5.1.2 in the PERSONNEL Archives – Procedures Manual, in particular part of "CFC / Career Personal Data (red)". You mention that since this file contains multiple documents, it is the longest retention period that is reflected in this table (3 years), but that D@W-related documents will be destroyed as per their retention schedule. Please be informed that the EDPS is ok with this approach provided that the EIB keeps track of D@W documents with shorter retention to ensure that they are not kept longer than necessary and in line with the EIB retention schedule. In addition, you have confirmed that electronic files are also covered by this manual. Since this was not fully clear to us, please just make ensure that the EIB staff are aware of this.

To conclude, the EDPS takes note of the measures implemented and the commitments by the EIB in the follow up to the recommendations of the inspection report, with all the recommendations now being closed. The EDPS will therefore **close case 2015-0633**. The EDPS nevertheless recalls that in line with the accountability principle set out in Regulation (EU) 2018/1725, the controllers are obliged to implement appropriate and effective measures and be able to demonstrate the compliance of processing activities with the Regulation, including the effectiveness of the measures.

Kind regards,
[REDACTED]



[REDACTED]
Legal Officer - Supervision & Enforcement Unit

[REDACTED]
European Data Protection Supervisor

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