

Record of processing activity

EBA Single Rulebook Q&A

Record of EBA activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 (EUDPR)

Part 1 - Article 31 Record (publicly available)	
1	Last update of this record 22/08/2024
2	Date of next review 22/08/2026
3	Reference number EBA/DPR/2023/13
4	Name and contact details of controller Controller: European Banking Authority, Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France Responsible Department: Legal and Compliance Unit Contact: qa-coordinator@eba.europa.eu
5	Contact details of DPO dpo@eba.europa.eu , or alternatively send a letter to the postal address of the EBA (address above) marked for the attention of the DPO of the EBA.
6	Name and contact details of joint controller (where applicable) Not Applicable
7	Name and contact details of processor (where applicable) Atos Belgium NV – provision of IT support Da Vincilaan 5–B-1930 Zaventem, Belgium https://atos.net/fr/
8	Short description of the processing activity This processing activity concerns processing of personal data in the context of the EBA Single Rulebook Q&A. The following activities are performed: 1) receiving Q&As from externals via the Q&A Tool, which is a dedicated portal in the EBA website. Only authenticated people can access it to submit a question and they need to provide an email address when registering;

Part 1 - Article 31 Record (publicly available)

2) submitted Q&As are imported in a management tool to which only dedicated EBA staff has access (only the EBA staff has access to the submitter's personal data);

3) Q&As are categorised by consulting the EU Commission and representatives of the Competent Authorities, these latter have also limited access to the Q&A tool, but not to the management tool (the personal data of the submitters is not provided to the EU commission and to the Competent Authorities);

4) once a Q&A is categorised, it is published in the Q&A tool as rejected or under review, in accordance to Article 16b of the EBA founding regulation (Regulation (EU) No 1093/2010);

5) once an answer is agreed, it is published in the Q&A tool.

9 Purpose of the processing activity

The personal data is processed to ensure the management of the Single Rulebook Q&A. The Single Rulebook Q&A is a mean of the EBA to publicly address questions from stakeholders on regulation and to promote consistent understanding and convergent application of the regulation.

Stakeholders can submit questions on the practical application or implementation of the banking, payment services, AML/CFT and other legislation that falls within the EBA's remit. This includes the associated delegated and implementing acts, RTS, ITS, guidelines and recommendations.

The EBA processes the name of the submitter and their email address to ensure consistency in the application of the Single Rulebook and all the texts that are in the scope of the EBA according to article 16b of the EBA founding regulation.

10 Categories of data subjects (persons whose data the EBA is processing) in this activity

External to the EBA:

- the submitters of Q&A (registered as guests in the EBA website);
- Extranet users from the Competent Authorities with access to the Q&A tool;
- Technical Support providers.

Internal to the EBA:

- the EBA Staff responsible for handling the Q&A process;
 - the EBA Staff responsible for the administration of the Q&A tool;
 - the EBA Staff responsible for the archiving;
-

Part 1 - Article 31 Record (publicly available)

11 Categories of personal data involved in this processing activity	<p>The EBA processes the following categories of personal data:</p> <ul style="list-style-type: none"> - Extranet authentication data; - Name of the natural person or entity who is submitting a question; - Country of incorporation; - Email address; - Any information that the submitters put in their questions, background information and proposed answer to better identify the issue about which they ask for clarification.
12 Special categories of personal data processed (as defined in Article 10 EUDPR)	<p>No special categories of data are specifically required but this type of data can be provided by own initiative of the submitter.</p>
13 Time limit for keeping the data	<p>The EBA will keep the personal data internally for 10 years from the moment of finalisation of the Q&A, after which the name and email address of the submitter will be deleted. The Q&A without any reference to the submitter will remain available to the public indefinitely.</p>
14 Recipients of the data	<p>The personal data can be accessible to the:</p> <ul style="list-style-type: none"> - Q&A coordinator team and the EBA staff with access to the management tool can see the email address of the submitters and their name; - the EBA Staff responsible for the administration of the Q&A tool; - the EBA Staff responsible for the archiving; - The name (but not the email address) can be made public at the moment of publication of the Q&A if required so by the submitter.
15 Are there any transfers of personal data to third countries or international organisations?	<p>No.</p>
16 General description of security measures, where possible	<p>Adapted security measures had been put in place. The file "additional background and guidance on submitting Q&As" clarifies what type of information is required to process Q&As. The managerial software records the name and email of the submitter but the files it generates to share with the externals (CAs and COM) involved in the Q&A process do not contain such information.</p>
17 For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	<p>The Data Protection Notice is available on the page of the EBA Single Rulebook Q&A.</p>