

Record of processing activity

Ethics Activities

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	<p>Last update of this record 20/12/2024</p>
2	<p>Date of next review 20/12/2026</p>
3	<p>Reference number EBA/DPR/2024/9</p>
4	<p>Name and contact details of controller Controller: European Banking Authority, Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France</p> <p>Responsible Department: Legal and Compliance Unit</p> <p>Contact: ethics@eba.europa.eu</p>
5	<p>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.</p>
6	<p>Name and contact details of joint controller (where applicable) <i>Not applicable</i></p>
7	<p>Name and contact details of processor (where applicable)</p> <ol style="list-style-type: none"> 1. CANCOM online BVBA Rue Montoyer 35 Brussels Belgique Cancom provides Network services 2. Microsoft Ireland Operations Limited Microsoft EU Data Protection Officer One Microsoft Place South County Business Park Leopardstown Dublin 18 D18 P521 Ireland Telephone: +353 (1) 706-3117 https://aka.ms/privacyresponse Link to Privacy Documentation

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3. Bechtle Brussels NV/SA
Peerderbaaan 207
3910 Neerpelt
Belgium
Bechtle provides the Jira software for IT service desk and incident management

4. Consortium COSMOTE GLOBAL SOLUTIONS N.V. – Atos Luxembourg PSF SA
COSMOTE GLOBAL SOLUTIONS, Avenue des Arts 56, B-1000 Brussels
Belgium
and
Eviden Luxembourg S.A.
12 rue du Château d'Eau
3364 Leudelange
Luxembourg

8	Short description and purpose of the processing activity	<p>The EBA is committed to maintaining high ethical standards of professional conduct by all those involved in the activities of the EBA.</p>
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The purpose of the data processing is:

- to safeguard the independence and reputation of the EBA, its constituent bodies as well as its staff by protecting them from any malicious allegations;
- to maintain the integrity of official policy and administrative decisions making and of public management generally;

recognising that an unresolved conflict of interests may result in an abuse of public office.

In particular, this processing activity ensures compliance with the legal obligations concerning ethics and conflict of interest stemming from the Staff Regulations and the Conditions of Employment of Other Servants and from EBA decisions.

The Ethics activities involve processing of various notifications and declarations that are mainly processed within the Ethics Workflow or EU Survey. Some notifications and declarations can be processed outside these platforms, in particular notifications/requests from non-staff and staff that have left the EBA and do not have access to the Ethics workflow

The Ethics Workflow is an online SharePoint platform designed to document, manage and assess ethics-related notifications and declarations. The platform is accessible only internally to the EBA staff through the intranet. EU Survey is an online tool for creating and publishing surveys and forms created by the European Commission. The data protection notice is available [here](#).

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In this regard, the EBA processes personal data in the context of the EBA Ethics Workflow to manage and assess the following notifications and declarations:

- Notifications of intended activity after leaving the EBA for Seconded National Experts, for Temporary and Contractual Agents, and for Trainees;
- Staff Annual Declaration of Interests;
- Ad-Hoc Declaration of Interests;
- Pre-employment Declaration of Interests;
- Authorisation for outside activity and assignments;
- Gainful employment of spouse of partner;
- Authorisation to accept a gift favour or donation;
- Notification of dealings in financial instruments;
- Prior clearance of dealings in financial instruments;
- Confidentiality undertaking;
- Confirmation of reading the DOI policy and ethics guidelines;
- Notification of publication.

The Conflict of interest declarations of senior management and boards members are made public on the EBA website.

<p>9 Description of categories of persons whose data the EBA processes and list of data categories</p>	<p>The following categories of persons can be concerned by this processing operation:</p> <ul style="list-style-type: none"> • Members of governance bodies; • EBA staff members (Temporary Agents, Contract Agents); • Seconded National Experts; • Staff exchanges; • Trainees. <p>Commonly for all requests, the following personal data may be processed: first name and surname, staff number, administrative status, department, email, description of the planned activity and digital signatures of applicant.</p> <p>In addition, there will be processed further personal data specifically related to the scope of the individual declaration or notification such as financial information, information on previous employment, etc.</p>
<p>10 Special categories of personal data processed (as defined in Article 10 EUDPR)</p>	<p>No special categories of personal data are specifically required.</p>

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11 Time limit for keeping the data	<p>The EBA will keep the personal data up to five years after the submission of the declaration or notification.</p> <p>Certain declarations of senior managers and board members are kept for longer period and after redaction made public on the EBA website.</p>
12 Recipients of the data	<p>The personal data can be accessed by the Ethics Officer and the dedicated Risk and Compliance team members. In certain situations, the personal data may be accessed by the Line Manager of the personal having introduced the declaration or notification, the Appointing Authority and the members of the Joint Committee. In addition, the personal data can be accessible to the dedicated team members from EBA IT Unit for the purposes of IT support.</p>
13 Are there any transfers of personal data to third countries or international organisations?	<p>The EBA will not transfer personal data to third countries or international organisations.</p>
14 General description of security measures, where possible	<p>Processing of personal data in the context of this processing activity is performed under the EBA Information Security Framework, published on the EBA intranet.</p>
15 For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	<p>There is one general data protection notice and several specific data protection notices. The data protection notices can be provided in the Ethics Workflow, can be sent to the data subjects by email (e.g. Pre-Dol), attached to the EU Survey (e.g. Annual COI for non-staff), or provided in the intranet.</p>