



# Record of Personal Data Protection of Personal Data Processing Activity, pursuant to Article 31 of Regulation (EU) 2018/1725<sup>1</sup>

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## NAME OF PROCESSING OPERATION:

**Control of the financial contribution paid to the European Commission for the EBA staff members children enrolled in the European School Paris La Défense**

### I. GENERAL INFORMATION

#### 1) Contact Details of Controller(s) (Note 2)

Name: European Banking Authority, represented by the Executive Director.

Email Address: [ExecutiveOffice@eba.europa.eu](mailto:ExecutiveOffice@eba.europa.eu)

#### 2) Contact Details of Processor

*Who is actually conducting the processing?*

The data is processed by the EBA itself.

Department/Unit: The Human Resources Unit and the EBA Finance and Procurement Unit will be conducting the processing activity.

Email Address: [HRTeam@eba.europa.eu](mailto:HRTeam@eba.europa.eu)

### II. DESCRIPTION & PURPOSE OF PROCESSING

#### 3) Description of Processing (see Note 3)

By signing a *Mandate and Service Agreement* with the European Commission (hereinafter "COMM"), the EBA mandates the COMM to conclude the *EU Contribution Agreement* in the name and on behalf of the EBA with the *European school Paris La Défense*, which is a Type II school, accredited by the Board of Governors of the European schools (hereinafter the "AES"). The conclusion of the *Mandate and service agreement* between the COMM and the EBA, as well as the conclusion of the *EU Contribution agreement* between the COMM and the AES are

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<sup>1</sup> Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC

obligatory for the application of the Commission Decision C(2013) 4886 of 1 August 2013 *on the putting into effect of the EU contribution paid on a pro-rata basis to schools accredited by the Board of Governors of the European Schools according to the number of children of EU staff enrolled, replacing Commission Decision C(2009) 7719 of 14 October 2009 as amended by Commission Decision C(2010) 7993 of 8 December 2010* (hereinafter the “Decision”). The mentioned Decision puts into effect the EU contribution paid on a pro-rata basis to schools accredited by the Board of Governors of the European Schools according to the number of children of EU staff member enrolled, and foresees the possibility of free of charge priority enrolment of EU staff pupils in these schools in exchange of a financial contribution.

In view of the implementation of the EU Contribution agreement concluded by the COMM in the name and on behalf of the EBA with the AES, the AES provides to the EBA the lists of EBA staff children enrolled at the beginning/end of a respective school year. The EBA verifies the lists to ensure that the pupils for whom the AES asks for a financial contribution, indeed are EBA staff member children.

The list, putting forward the first name/name of the child as well as the first name/name of the parent working for the EBA as well as the school cycle, in which the child is enrolled, is sent via email, protected by a password, by the AES to the EBA – HR Unit. The password is communicated by the AES to the relevant EBA HR member by phone.

Designated staff of the EBA Finance and Procurement Unit carrying out the payment of the EU Contribution to the COMM will be receiving the list.

#### 4) Purpose of processing (see Note 4)

*Why are the personal data being processed?*

*Specify the rationale and underlying reason for the processing*

Staff administration

The purpose of processing is to implement the EU Contribution agreement concluded by the COMM in the name and on behalf of the EBA with the AES, which foresees free of charge priority enrolment of EU staff pupils in the AES, in exchange of a financial contribution paid to the COMM. The names of the EBA staff members and their children are used for identification purposes.

Relations with external parties

The purpose of the processing is to facilitate the cooperation with the COMM and the AES for the payment of the EU Contribution

Procurement, finance and accounting

Designated staff of the EBA Finance and Procurement Unit carry out the payment of the EU Contribution to the COMM.

The cycle and the grade of the children is processed in order to determine the amount of the financial contribution paid to the COMM.

Administration of membership records

Auditing

Information administration

Other (please give details):

## 5) Lawfulness of Processing

*Article 5 of Regulation (EU) 2018/1725*

A. Legal Basis justifying the processing:

We process your personal data, because according to Art. 5.1 (b) of the Regulation (EC) N°/2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions; the processing is necessary for compliance with a legal obligation to which the controller is subject, namely for the sound financial management of the budget granted to the accredited European Schools, in accordance with Commission Decision C(2013) 4886 of 1 August 2013.

B. Processing is necessary:

- for the performance of a task carried out in the public interest
- for compliance with a legal obligation to which the Controller is subject
- for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- in order to protect the vital interests of the data subject or of another natural person

Or

- Data subject has given his/her unambiguous, free, specific and informed consent

### III. CATEGORIES OF DATA SUBJECTS & PERSONAL DATA

#### 6) Categories of Data Subjects (see Note 5)

*Please tick all that apply and give details where appropriate*

- EBA Temporary Agents or Contract Agents
- SNEs or trainees
- Visitors to the EBA (BoS, MB, Working Groups, Sub-Groups, Seminars, Events, other)  
 If yes, please specify:
- Providers of good or services
- Complainants, correspondents and enquirers
- Relatives and associates of data subjects : children of EBA's Temporary Agents or Contract Agents, enrolled at the AES.
- Other (please specify):

#### 7) Categories of personal data (see Note 6)

*Please tick all that apply and give details where appropriate*

##### (a) General personal data:

The personal data contains:

- Personal details (name, address etc): full name of EBA staff, contract type, full name of the EBA staff pupils.
- Education & Training details: cycle of education (Nursery, Primary or Secondary) and Grade of the EBA staff pupils, the period of enrolment.
- Employment details
- Financial details
- Family, lifestyle and social circumstances

Other (please give details) :

##### (b) Special categories of personal data:

The personal data reveals:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic or Biometric data
- Data concerning health, sex life or sexual orientation

**Important Note**

If you have ticked any of the sensitive data boxes contact the Data Protection Officer before processing the data further.

#### IV. CATEGORIES OF RECIPIENTS & DATA TRANSFERS

##### 8) Recipient(s) of the data

*To whom is the data disclosed?*

- Managers of data subjects
- Designated EBA staff members:  
(Designated staff members of the Human Resources Unit and Finance and Procurement Unit).
- Relatives or others associated with data subjects
- Current, past or prospective employers
- Healthcare practitioners
- Education/training establishments
- Financial organisations
- External contractor

Other (please specify):

**9) Data transfer(s)**

*Is the data transferred outside the EBA?*

Within the EBA or to other EU Institutions/Agencies/Bodies

If yes, please specify: The data is not disclosed outside the EBA.

To other recipients within the EU (e.g. NCAs)

To third countries

If yes, please specify:

a) the country:

b) whether suitable safeguards have been adopted:

Adequacy Decision of the European Commission<sup>2</sup>

Standard Contractual Clauses

Binding Corporate Rules

Administrative Arrangements between public Authorities

To international organisations

If yes, please specify the organisation and whether suitable safeguards have been adopted:

**Important Note**

If no safeguards have been put in place, please contact the DPO before processing the data further.

<sup>2</sup> Third countries for which the European Commission has issued adequacy decisions are the following: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

## V. RETENTION PERIOD & SECURITY MEASURES

### 10) Retention period (see Note 7)

A. How long will the data be retained and what is the justification for the retention period?

For a period of five (5) years after the end of the school year N/N+1, all relevant data are collected and preserved, in line with provisions of art 10. Collection, preservation and verification of the Decision.

B. For further processing envisaged beyond the original retention period for historical, statistical or scientific purposes, please specify whether the personal data will be anonymised: N/A

No

Yes

### 11) Storage media & security of processing

A. Please indicate how and where the data processed are stored  
(e.g. Share Point / cloud):

The lists are saved on the HR drive where only HR team members have access.

B. Technical & Organisational Security measures adopted:

Controlled access to ICT-system/controlled access codes

Restricted access to physical location where data is stored

Pseudonymisation and Encryption

Back-up

Audit trails

Confidentiality agreement/clause

Test the effectiveness of security measures adopted

Training of staff

Other (please specify):

**Consultation of the Data Protection Officer and Deputy Data Protection Officer**

Email Address: [dpo@eba.europa.eu](mailto:dpo@eba.europa.eu)

Date of consultation: 02/09/2021

Date of approval of processing: 07/09/2021

**Privacy statement** available at:

[https://intranet.eba.europa.eu/StaffMatters/Documents/Regulation%20and%20policies/2.%20Data%20Protection%20Notice%20-%20Accredited%20European%20School\\_final%20DP.pdf](https://intranet.eba.europa.eu/StaffMatters/Documents/Regulation%20and%20policies/2.%20Data%20Protection%20Notice%20-%20Accredited%20European%20School_final%20DP.pdf)  
Staff Matters > Conditions of Employment > Regulations and Policies > Privacy Statements

**Date of insertion in Register:**

20/09/2021



## Guidance Notes

### Note 1

Enter here the name of the processing operation involving personal data (e.g. staff recruitment, business continuity contact list)

**Personal data** is any information relating either directly or indirectly to a living identified or identifiable person. This information may, for example, be the name, date of birth, a telephone number, biometric data, medical data, professional details, etc.

**Processing** means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

### Note 2

In case of more than one controller (i.e. joint processing operations), all controllers need to be listed.

### Note 3

Enter any details of the processing operation that are not clear from the name of the operation entered above.

### Note 4

Personal data must only be collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those processes.

### Note 5

The data subject is an identified or identifiable natural person who is the subject of the personal data.

### Note 6

According to Article 10 of Regulation (EU) 2018/1725, the processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, as well as of genetic and biometric data, and data concerning health and sex life or sexual orientation, is generally prohibited but exemptions may apply.

### Note 7

Personal data should be kept for no longer than is necessary for the purposes for which the data were collected or for which they are further processed.