

# Record of processing activity

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## Ethics declarations by non-staff

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

Nr	Item	Description
<b>Part 1 - Article 31 Record (publicly available)</b>		
1	Last update of this record	31/01/2024
2	Reference number	EBA/DPR/2023/7
3	Name and contact details of controller	<p>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: <a href="mailto:ethics@eba.europa.eu">ethics@eba.europa.eu</a></p>
4	Name and contact details of DPO	<a href="mailto:dpo@eba.europa.eu">dpo@eba.europa.eu</a>
5	Name and contact details of joint controller (where applicable)	Not applicable
6	Name and contact details of processor (where applicable)	<p>EUSurvey – for the collection of the information.</p> <p>EUSurvey Privacy Statement – <a href="https://ec.europa.eu/eusurvey/home/privacystatement">https://ec.europa.eu/eusurvey/home/privacystatement</a></p>
7	Short description and purpose of the processing	<p>The EBA is committed to maintaining high ethical standards of professional conduct by all those involved in the activities of the EBA.</p> <p>The purpose of the processing of personal data is to ensure compliance with the legal obligations concerning ethics stemming from the Decision on the EBA’s Policy on Independence and Decision-making processes for avoiding Conflicts of Interest (Conflict of Interest Policy) for Non-Staff (EBA/DC/2020/38 of 22 January 2020), that was adopted by the EBA’s Board of Supervisors.</p> <p>In this regard, the EBA processes personal data to manage and assess the following declarations of non-staff:</p>

Nr	Item	Description
		<ul style="list-style-type: none"> <li>- Declarations of interests.</li> <li>- Declarations of intention.</li> <li>- Curriculum Vitae.</li> <li>- Declarations of prospective employment of voting members of the Board of Supervisors and Management Board</li> </ul> <p>The EBA uses EUSurvey (link <a href="#">here</a>) to collect data from data subjects concerning the declarations of interests, declarations of intention and CV.</p> <p>For the declaration of prospective employment, the EBA uses a word form that it sends by email.</p> <p>All declarations of interests, and the declarations of intention and Curriculum Vitae of BoS and MB members are published in the EBA's website (<a href="#">here</a>) for transparency purposes. The irrelevant personal data from the Curriculum Vitae of BoS and MB members will be redacted.</p>
8	Description of categories of persons whose data the EBA processes and list of data categories	<p>The following categories of persons can be concerned by this processing operation:</p> <p>(a) The Voting Members of the Board of Supervisors, the Members of the Management Board and their officially nominated Alternates;</p> <p>(b) The Observers, i.e. the heads of national competent authorities of the non-EU Member States of the EEA, Non-voting Members i.e. representatives of the European Commission, the ESRB, ESMA, EIOPA, and the representative nominated by the Supervisory Board of the ECB, and any representatives of national competent authorities referred to in Article 40(4) of Regulation (EU) No 1093/2010;</p> <p>(c) The Members, Observers and Non-Voting Members of the Standing Committee on Anti-money Laundering and Countering Terrorist Financing (AMLSC) and their officially nominated Alternates;</p> <p>(d) The Members, Observers and Non-Voting Members of the Standing Committee on Resolution (ResCo) and their officially nominated Alternates;</p> <p>(e) The Members of the Independent Panels established in accordance with Article 41 for the purposes of Article 17, 19 and 22(4) of Regulation (EU) No 1093/2010 (the 'Independent Panels').</p> <p>Commonly for all requests, the following personal data may be processed: first name and surname, competent authority, involvement in the EBA, signature.</p> <p>In addition, there will be processed further personal data specifically related to the scope of the individual declaration. In the case of the CV, there will be details of educational background and professional experience. In the case of the declaration of prospective employment of voting members of the BoS and</p>

<b>Nr</b>	<b>Item</b>	<b>Description</b>
		members of MB, personal data will include: personal address, telephone number and email; work address, telephone number and email; details of the new employment of the former voting BoS/MB member; signature.
9	Time limit for keeping the data	The EBA will keep the personal data for two years after the departure of the member from the respective board or committee.
10	Recipients of the data	The personal data can be accessed by the Chair, the Ethics Officer and the dedicated Risk and Compliance team members. Due to transparency obligations, the information concerning interests contained in individual declarations of interests are collected in a single excel file and published in the EBA's website; the declarations of intention and CV (with redacted irrelevant information, if any) of members of the BoS and MB are also published on the EBA's website.
11	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No
12	General description of security measures, where possible	Processing of personal data in the context of this processing activity is performed under the EBA Information Security Framework, published on the EBA intranet.
13	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	The Privacy Notice is available directly in EU Survey and in the EBA's website.