



Record of processing activity

Confirmation of reading the Ethics Guidelines and the Conflict of Interests Policy

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

Nr	Item	Description
Part 1 - Article 31 Record (publicly available)		
1	Last update of this record	19/07/2021
2	Reference number	EBA/DPR/2021/7
3	Name and contact details of controller	Controller: European Banking Authority, Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France Contact: ExecutiveOffice@eba.europa.eu
4	Name and contact details of DPO	dpo@eba.europa.eu
5	Name and contact details of joint controller (where applicable)	Not applicable
6	Name and contact details of processor (where applicable)	Not applicable
7	Short description and purpose of the processing	<p>Article 4.1 of the Decision of the Executive Director on the EBA's Policy on Independence and Decision-Making Processes for avoiding Conflicts of Interests (Conflicts of Interest Policy) for Staff and other Contractual Staff (EBA DC 104rev1 of 10 May 2017) requires that staff shall declare having read Article 11a of the Staff Regulations, the EBA Ethics Guidelines and the Conflicts of Interest Policy and confirm their awareness of their obligations.</p> <p>Upon joining the EBA, staff members are requested to confirm in writing, by using a specified form, that they have read Article 11a of the Staff Regulations, the EBA Ethics Guidelines and the Conflicts of Interest Policy. The Ethics Officer will send them both decisions and a copy of the Staff Regulations (normally a website link). The staff member needs to sign the form and send it back to the Ethics</p>

Nr	Item	Description
		Officer, who will then store it securely. Where necessary, this will be recorded in the staff member's personal file.
8	Description of categories of persons whose data the EBA processes and list of data categories	EBA staff (temporary agents, contract agents and seconded national experts), interim employees, trainees and consultants. The personal data to process are: first name and surname, email, staff number and signature.
9	Time limit for keeping the data	The EBA will keep the personal data for two years after the staff have left the EBA.
10	Recipients of the data	The Executive Director in his capacity as the appointing authority to conclude contracts, the Ethics Officer and members of the Legal and Compliance Unit authorised to have access to these confirmations by the Ethics Officer.
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	The confirmations of having read the Ethics Guidelines and the Conflict of Interests Policy are stored in a folder that is solely accessed by the Ethics Officer and by members of the Legal and Compliance Unit who've been authorised by the Ethics Officer.
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 published in the intranet. https://intranet.eba.europa.eu/StaffMatters/Pages/Ethics.aspx The link to the privacy notice is also included in the email with the form requesting to confirm that they have read Article 11a of the Staff Regulations, the EBA Ethics Guidelines and the Conflicts of Interest Policy.