

Record of processing activity

Medical Services

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	29/07/2026
2	Date of next review	29/07/2028
3	Reference number	EBA/DPR/2022/09
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: Operations Contact: eba-dpc-hr@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)	The data processors are providing medical services: <u>European Commission Medical Services</u> Brussels, Belgium (DG HR, Unit D3) Luxembourg, Luxembourg (DG HR, Unit D4) Ispra, Italy (DG HR, Unit D5) The Data Protection Officer of the Commission: DATA-PROTECTION-OFFICER@ec.europa.eu <u>Elsan Prévention SAS</u> 38 quai des Jemmapes, 75010 Paris, France Data Protection Officer: dpo@elsan.care <u>Kara Connect Ireland Limited</u> The Academy, Huckletree, 42 Pearse St, Dublin, Ireland

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Contact: security@karaconnect.com

8 Short description and purpose of the processing activity	The purpose of processing of personal data of data subjects (Temporary Agents (TA), Contract Agents (CA), Seconded National Experts (SNE), trainees and candidates) is to ensure the EBA's compliance with obligations related to the provision of the following medical and wellbeing services: 1. Pre-employment medical tests: the pre-employment medical tests are mandatory examinations for candidates (future staff of the EBA) and comply with one of the eligibility requirements for the employment of staff ("physically fit to perform duties") determined by Article 28(e) and 33 of the Staff Regulations and Articles 12(2)(d), 13, 82(3)(d) and 83 of the Conditions of Employment of Other Servants of the European Union (CEOS). The European Commission Medical Services or Elsan Prévention SAS are requested to perform these general tests and examinations (list of examinations are sent to the candidates in the email invitation to the pre-employment medical visits). The results of these tests shall be requested by the candidates. The results of the tests are kept confidential and not being disclosed to EBA HR staff. 2. Assessment of the results following the pre-employment medical tests for candidates: after the pre-employment medical examination the European Commission Medical Services or Elsan Prévention SAS informs the responsible EBA-HR staff members working in this area if the candidates are physically fit to perform their duties (in a form of pre-employment medical certificate). The results of the tests are kept confidential and not being disclosed to EBA HR staff. 3. Annual medical tests: the annual medical examination is a yearly health screening for the staff members (TAs and CAs) of the EBA and is determined by Article 59(6) of the Staff Regulations. The European Commission Medical Services or Elsan Prévention SAS will be requested to perform these general tests and examinations (list of examinations are sent by the medical service providers to the staff members directly) and communicate the results to the staff members. The results of the tests are kept confidential and not being disclosed to EBA HR staff. 4. Preventive care and wellbeing campaigns: Under preventive care, staff (TA or CA) can request comprehensive health screening depending on their gender and age, according to current medical recommendations offered by the European Commission Medical Services. Staff (TA or CA) can also request glasses for working on computer and receive 100% reimbursement within the limit of the ceilings. In order to promote the health of the staff of the EBA (TAs, CAs, SNEs and trainees), the EBA may ask the medical service providers to organise annual campaigns for seasonal influenza or similar vaccinations (in case of a pandemic or any other need of mass immunization campaigns). The medical service providers may be asked to organise wellbeing campaigns, give presentations and
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general recommendations on work-related, health style and well-being issues (e.g. nutrition, cardiovascular care, stopping smoking, melanoma prevention, seasonal affective disorder (SAD), etc.).

5. Sick leave certificate validation: staff (TAs, CAs, SNEs, and trainees) shall send sick leave certificates, requests for special leave due to sickness or other sick-leave related matters directly to the European Commission Medical Services in line with Articles 59 and 60 of the Staff Regulations and Articles 16 and 91 of the CEOS. The processing of personal data is done in order to justify sickness-related absences of staff members.

6. Requests for allowances in case of serious illness of a child: staff (TA or CA) shall send their requests for a double dependent child allowance and parental leave allowance due to serious illness of a child to European Commission HR Services, which then forward these to the European Commission Medical Services for their validation.

7. Request for family leave: due to a serious illness of a family member, staff (TA or CA) shall send the medical report of their close family member to the European Commission Medical services for their validation.

8. Psychosocial support: staff (TA or CA) have been going through a difficult period because of a private matter or because of their work, the Psychosocial Sector of the European Commission Medical Services could provide support to them.

9. Management of the invalidity procedure: the European Commission Medical Services are fully responsible for the organisation of the work of the Invalidity Committee and represent the EBA for invalidity cases in the Invalidity Committee in line with Section 3 of Annex 2 of the Staff Regulations. The Invalidity Committee's role is to assess whether the staff member (TA or CA) is fit to perform their duties or if the staff member satisfies the invalidity conditions stated in the Staff Regulations and the CEOS.

10: Workplace mental health and wellbeing support: the EBA may use Kara Connect, a workplace mental health and wellbeing platform, to provide staff members with confidential access to qualified professionals, including therapists, coaches and other wellbeing specialists, and to webinars or talks on mental health and wellbeing. The platform is intended to support early and preventive care. The EBA shall receive only anonymised usage insights and shall not have access to personal data concerning the support requested or consultations. Kara Connect remains controller of the personal data provided to them as part of delivery of their services.

The personal data is also processed in order to pay the costs of the medical services, performed at the European Commission Medical Services, Elsan Prévention SAS and Kara Connect.

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9 Description of categories of persons whose data the EBA processes and list of data categories	Data subjects are Temporary Agents (TA), Contract Agents (CA), Seconded National Experts (SNE), trainees and candidates to selection procedures. 1. EBA-HR provides the following data to the European Commission Medical Services for the services of: <i>Pre-employment medical visit (data subjects: candidates):</i> Surname, forename, personnel number, date and place of birth, nationality, gender, e-mail address, post for which the candidate applied, type of contract. <i>Annual medical visit (data subjects: TAs and CAs):</i> Surname, forename, personnel number, date of birth, nationality, , gender, e-mail address, type of contract. <i>Invalidity procedure (data subjects: TAs and CAs):</i> Surname, forename, personnel number, date and place of birth, nationality, gender, e-mail address, telephone numbers, name of family doctor, postal address. <i>Sick leave certificate (data subjects: TAs, CAs, SNEs, trainees):</i> Data subjects directly contact the European Commission Medical Services. <i>Preventive care (data subjects: TAs, CAs) in comprehensive health screening and requesting glasses for working on computer data subjects directly contact the European Commission Medical Services.</i> <i>Wellbeing campaigns (data subjects: TAs, CAs, SNEs, trainees):</i> Surname, forename, email address, date of birth, gender, personnel number. 2. EBA-HR provides data to Elsan Prévention SAS under the framework contract EBA/2025/OP/0001/L1.1: <i>Annual medical visits (data subjects: TAs and CAs):</i> Surname, forename, address, email address, date of birth, gender, personnel number. <i>Preventive care, health and wellbeing campaigns (data subjects: TAs, CAs, SNEs, trainees)</i> Surname, forename, email address, date of birth, gender, personnel number. 3. EBA-HR provides data to Elsan Prévention SAS under the framework contract EBA/2025/OP/0001/L2.1: <i>Pre-employment medical visit (data subjects: candidates):</i> Surname, forename, date of birth, nationality, gender, email address. 4. EBA-HR provides data to Kara Connect under the framework contract ref.26-1175-01<i>Wellbeing HUB by Kara Connect (data subjects: users):</i> Name, forename, email address (if access to SSO is not possible).
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10	Special categories of personal data processed (as defined in Article 10 EUDPR)	Health data is be processed by qualified medical services providers as part of this processing activity. The EBA does not process such data.
11	Time limit for keeping the data	<u>EBA</u> Certificate and emails exchange with the staff members demonstrating proof of attendance at medical appointments; confirmation of pregnancy; certificates confirming attendance of a sick relative are kept for 2 years. Email exchanges between candidates and EBA-HR as regarding pre-employment medical visit and information received from the European Commission Medical Services: pre-employment medical certificate, validation confirming sick leave, medical control, invalidity is kept by the EBA for 30 years after the staff member ceases work at the EBA, in line with the European Commission's retention policy. <u>European Commission</u> Medical files are kept for 30 years after the staff member ceases work at the EBA. In the case of persons exposed to carcinogens or mutagens, files are kept for 40 years after the last exposure incident or, in any event, until the staff member reaches the age of 75. (General Regulation for the protection of workers, Belgium, Article 16, occupational medical services). Pre-recruitment medical examination files for applicants who are not recruited will be destroyed after one year. In the event of a negative medical opinion, the file will be destroyed after 5 years if no complaint has been lodged. <u>Elsan Prévention SAS</u> 5-year retention period: for organization of the check-up and appointment scheduling and sending of information and documents before the check-up. Legal retention periods related to care in the health sector: for the performance of the Beneficiaries' health check-up and sending of the results to the Beneficiary. Personal data relating to billing management (invoices), for the legal, tax and accounting retention period are kept for 10 years. Further information on retention period by Elsan Prévention SAS is available in their data protection notices. <u>Kara Connect</u> 1-year retention period for centralised logging via CloudWatch (application, system, and infrastructure logs) defined by Kara Connect independently.
12	Recipients of the data	<u>EBA</u>

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All documents are kept in the electronic format on the secure EBA network, and no physical documents are kept.

HR Unit: Only the responsible HR staff members working in this area have access to the following data: pre-employment medical certificate; validation of sick leave, medical control, invalidity from the European Commission Medical Services; confirmation of pregnancy; certificates confirming attendance of a sick or disabled relative.

Managers: Managers will only receive information (not containing medical information) regarding the period(s) a staff member is on sick leave in order to redistribute tasks.

IT Unit: Also, if appropriate, specialised members of the IT Unit involved in the management of the Human Resources processes may access the HR electronic folders where the above-mentioned documents are stored; no access will be given to the certificates/documents themselves.

Legal and Compliance Unit: On a need-to-know basis, members of the Legal and Compliance Unit may have access to the pre-employment medical certificate in the case of complaints pursuant to Article 90 of the Staff Regulations.

European Commission Medical Services

Staff members have access to their medical file according to the rules defined in Conclusion 221/04 of the Heads of Administration; the document is available on request.

Restrictions may be applied in accordance with the Commission Decision (EU) 2019/154 of 30 January 2019 laying down internal rules concerning the restriction of the right of access of data subjects to their medical files (Decision (EU) 2019/154).

The medical file can be transferred to another European Institution or body, with the staff members' prior agreement, when they move from an Institution/body to another.

Access to the electronic medical file is only granted to Medical Services staff according to specific access rights described in a matrix available on request.

Elsan Prévention SAS

The recipients of the data are the members of

- Elsan Prevention SAS for the organisation of checkups and invoicing;
- and the following subcontractors:
- Association Voyage et Santé for coordination and delivery of checkups;
 - AVS SAS for the coordination and delivery of vaccination;

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		○ Laboratoire Inovie as the biological analysis service provider; ○ Excellence Imagerie as the Medical imaging service provider; ○ Accès Vision as the Ophthalmology service provider. <u>Kara Connect</u> Kara Connect uses data processors under signed DPAs, all located within the EU/EEA. The current, maintained list of sub-processors is published at their Trust Center: https://trust.karaconnect.com/subprocessors.
13	Are there any transfers of personal data to third countries or international organisations?	The EBA processed the personal data with the EU/EEA.
14	General description of security measures, where possible	<u>EBA</u> Documents, such as pre-employment medical certificate; proof of attendance at medical appointments; validation confirming sick leave, medical control, invalidity from the European Commission Medical Services; confirmation of pregnancy; certificates confirming attendance of a sick relative, and emails exchange with the staff members are stored in a separate outlook folder and drive, and accessible only to authorised persons. Fit for employment certificates are kept in the staff member's personal files on the EBA's server and/or are in locked cabinets in an access control office. <u>European Commission</u> Medical records are kept in an individual file and are stored in secure archives accessible only to authorised persons. Electronic medical records are stored in a secure environment and accessible only to authorised persons. The protection measures of medical records are described in a document called "protection et archivage des données à caractère personnel", available on request. <u>Elsan Prévention SAS</u> The data stored on the servers is backed up daily. In case of data loss, the data is restored to the previous day. Access to the data is restricted to authorized personnel and those in charge of the project. Employees of the health centre are bound by confidentiality agreements. An impact assessment has been conducted on the processing implemented by Elsan Prévention SAS concerning sensitive data. The premises of the health centre are monitored by alarm and video surveillance. Elsan Prévention SAS have installed secure servers in a location accessible only to authorized personnel performing maintenance. Offices are locked with access badges to protect the computers.

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Kara Connect

Personal data are stored in a secure environment and accessible only to authorised persons. Kara Connect has implemented technical and organisational measures to ensure the confidentiality and security of the data processed, including encryption of personal data, transport security, restricted network access, regular backups and internal confidentiality obligations. Kara Connect also applies data protection by design and by default. Information on the protection measures implemented by Kara Connect is available via its Security and Trust Centre pages.

15 **For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:**

Specific Data Protection Notice are available on the intranet and/or communicated directly to data subjects:
Specific Data Protection Notice Medical services – for candidates in selection procedures is provided directly to the selected candidate undergoing the pre-employment medical visit.
Privacy Notice – Medical services – for staff is available on the intranet.
Furthermore, the medical services providers shall provide the data subjects with their Specific Data Protection Notices for processing of medical data.