



Record of Personal Data Protection of Personal Data Processing Activity, pursuant to Article 31 of Regulation (EU) 2018/1725¹

Subscribing to the EBA Newsletter and daily email alerts

I. GENERAL INFORMATION

1) Contact Details of Controller(s) (Note 2)
Name: European Banking Authority (EBA) represented by the Executive Director Email Address: ExecutiveOffice@eba.europa.eu
2) Contact Details of Processor <i>Who is actually conducting the processing?</i>
Name/Data Protection Coordinator's Name: HR Communication Unit Department/Unit: PAC Email Address: communications@eba.europa.eu Date: 09.10.2020

II. DESCRIPTION & PURPOSE OF PROCESSING

3) Description of Processing (see Note 3)
External users that are interested in subscribing to an EBA newsletter and daily alerts will be able to do so by filling out a subscription form on the EBA website. The form will consist of an email input field, CAPTCHA mechanism, consent box and reference to data privacy policy, and subscribe button. The provided information (email address will be used by the EBA Communication and/or the team managing the newsletter only, and exclusively for sending the mentioned Newsletter to the subscribers.

¹ 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

External users that are interested in subscribing to the EBA email alerts can do so by filling out the form on the EBA Extranet. The provided information is used to unequivocally identify each user and the data is processed only to allow the sending of email alerts.

Once included in a newsletter distribution list, the user remains on such list until they ask to be removed from it. Removal from any newsletter distribution list or from an EBA database can always be requested at any time by email, or by clicking on the *Unsubscribe* link at the bottom of each issue of the newsletter, or by clicking on *Manage my account* at the bottom of each email alert.

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
- Relations with external parties
- Procurement, finance and accounting
- 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:

Processing is based on the consent by data subject, in accordance with Article 5(d) of the Regulation (EU) 2018/1725 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

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

Other (please specify): Subscribers to the EBA Newsletters and daily email alerts

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)
- Education & Training details
- 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
- 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 imported in the European Commission tool Newsroom which is used to prepare and send the Newsletter and daily email alerts

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 Commission²

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.

V. RETENTION PERIOD & SECURITY MEASURES

² 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

10) Retention period (see Note 7)

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

Your personal data will be kept for as long as needed for the purpose of ensuring the subscription service. Once included in a newsletter distribution list, you remain on this list until you ask to be removed from it. Removal from any newsletter distribution list or from an EBA database can always be requested at any time by email, or by clicking on the *Unsubscribe* link at the bottom of each issue of the newsletter, or by clicking on *Manage my account* at the bottom of each email alert.

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:

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 personal data collected for the EBA Newsletters is stored in the European Commission tool Newsroom (Newsletter distribution list section) which is used to prepare and send the EBA Newsletters.

The personal data collected for the email alerts is stored in the EU Commission's department for informatics (DG DIGIT) servers.

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

Email Address: dpo@eba.europa.eu

Date of consultation: 09/10/2020

Date of approval of processing: 15/10/2020

Privacy statement available at:

https://www.eba.europa.eu/sites/default/documents/files/document_library/General%20Pages/Legal%20notice%20page/936392/2020%20EBA%20Privacy%20notice%20Newsletter%20and%20email%20alerts.pdf

Date of insertion in Register: 20/10/2020

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.