



# Record of processing activity

## Annual Declaration of Interests by staff members

### 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	19/07/2021
2	Reference number	EBA/DPR/2021/8
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	<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)	Not applicable
7	Short description and purpose of the processing	Article 11a of the Staff Regulations, applied to the EBA by analogy under Article 11 of the Conditions of Employment of Other Servants (CEOS), requires that a staff member shall not, in the performance of his/her duties, deal with a matter in which, directly or indirectly, he/she has any personal interest such as to impair his/her independence, and, in particular, family and financial interests. Moreover, Article 4.1 of the Decision of the Executive Director (EBA DC 104rev1) 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 of 10 May 2017 requires EBA staff members to make an annual declaration of interests (ADoI). They shall declare their financial interests and any other interests with respect to all activities in which they are involved or have been involved during the five years preceding the submission of the ADoI and which fall within the EBA's remit.

Nr	Item	Description
		The processing of personal data in the context of the annual declaration of interests serves both the purpose of meeting the statutory obligation of Article 11a of the Staff Regulations, and allowing the Executive Director to decide whether any measures are necessary to deal with an identified conflict of interests such as to guarantee the independence of the EBA's decision-making processes.
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 following data will be processed: first and family names, email, and signature; information on economic interests, i.e., stakes or shares in a body under the EBA's scope of action, in particular ISIN, date of acquisition, number of shares or nominal value, and date of sale. Other possible information to be collected refers to whether the staff member is member of a body with an interest in the subject matter, employment, consultancy, intellectual property, other memberships, and other (e. g., gainful employment of the spouse in the financial sector).
9	Time limit for keeping the data	The EBA will keep the personal data for one year after the submission of the declaration of interests in case that no interests have been declared, or interests are declared that do not require any measures by the Executive Director in his capacity as appointing authority. Where the interests declared require measures by the Executive Director, the declaration of interests shall be kept one more year after the actual implementation of measures as evidenced.
10	Recipients of the data	The Executive Director, the Ethics Officer and members of the Legal and Compliance Unit assisting him/her in the matter.
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 declarations of interests are stored in a folder that is solely accessed by the Ethics Officer and by members of the Legal and Compliance Unit assisting him/her in the matter.
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 in the intranet.  <a href="https://intranet.eba.europa.eu/StaffMatters/Pages/Ethics.aspx">https://intranet.eba.europa.eu/StaffMatters/Pages/Ethics.aspx</a>  The link to the Privacy Notice will be also included in the with the form for Annual Declaration of Interest.