



# Record of processing activity

## Ethics Workflow

### 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	04/04/2023
2	Reference number	EBA/DPR/2023/3
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)	<ol style="list-style-type: none"> <li>1. CANCOM online BVBA Rue Montoyer 35 Brussels Belgique Cancom provides Network services</li> <li>2. Microsoft Ireland Operations Limited Microsoft EU Data Protection Officer One Microsoft Place South County Business Park Leopardstown Dublin 18 D18 P521 Ireland Telephone: +353 (1) 706-3117 <a href="https://aka.ms/privacyresponse">https://aka.ms/privacyresponse</a> Microsoft provides tools such as Microsoft (MS) SharePoint, Outlook and Teams</li> <li>3. Bechtle Brussels NV/SA</li> </ol>

Nr	Item	Description
		<p>Peerderbaan 207 3910 Neerpelt Belgium Bechtle provides the Jira software for IT service desk and incident management</p> <p>4. UniSystems Systemes Informatiques Societe Anonyme Commerciale Unipersonnelle Rue des Deux Eglises 26, boite 4 B-1000, Bruxelles, Belgique UniSystems provides IT contractors</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. The Ethics Workflow is an online SharePoint platform designed to document, manage and assess ethics-related notifications and declarations. The platform is accessible only internally to the EBA staff through the intranet.</p> <p>The purpose of the processing of personal data is to ensure compliance with the legal obligations concerning ethics stemming from the Staff Regulations and the Conditions of Employment of Other Servants.</p> <p>In this regard, the EBA processes personal data in the context of the EBA Ethics Workflow to manage and assess the following notifications and declarations:</p> <ul style="list-style-type: none"> <li>• Notifications of intended activity after leaving the EBA for Seconded National Experts;</li> <li>• Notifications of intended activity after leaving the EBA for Temporary and Contractual Agents;</li> <li>• Notifications of intended activity after leaving the EBA for Trainees;</li> <li>• Staff Annual Declaration of Interests;</li> <li>• Ad-Hoc Declaration of Interests;</li> <li>• Pre-employment Declaration of Interests;</li> <li>• Applications for an outside activity;</li> <li>• Request for clearance to deal in financial products or instruments;</li> <li>• Gainful employment of spouse of partner;</li> <li>• Application for authorisation to accept a gift favour or donation;</li> <li>• Notification of financial dealings;</li> <li>• Notification of publication.</li> </ul>
8	Description of categories of persons whose data the EBA processes and list of data categories	The following categories of persons can be concerned by this processing operation:

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		<ul style="list-style-type: none"> <li>• All EBA staff members (Temporary Agents, Contract Agents)</li> <li>• Seconded National Experts</li> <li>• Trainees</li> </ul> <p>Commonly for all requests, the following personal data may be processed: first name and surname, staff number, administrative status, department, email, description of the planned activity and digital signatures of applicant.</p> <p>In addition, there will be processed further personal data specifically related to the scope of the individual declaration or notification.</p>
9	Time limit for keeping the data	The EBA will keep the personal data up to two years after the submission of the declaration or notification.
10	Recipients of the data	The personal data can be accessed by the Ethics Officer and the dedicated Risk and Compliance team members. In certain situations, the personal data may be accessed by the Line Manager of the personal having introduced the declaration or notification, the Appointing Authority and the members of the Joint Committee.
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 <a href="#">EBA Information Security Framework, published on the EBA intranet</a> .
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 the Ethics Workflow