

EDPB Personal data records of processing activities (Article 31 of the Regulation 2018/1725¹)

Record of EDPB activities processing personal data, based on Article 31 of 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.

Nr.	Item	Description
1.	Title of the processing operation	EDPB Annual Report – Stakeholders’ Survey
2.	Number of record	EDPB-12
3.	Last updated	January 2025
4.	Data controller	European Data Protection Board (EDPB) Edpb@edpb.europa.eu Rue Montoyer, 30 Belgium, Brussels
5.	Joint controllers	N/A
6.	Processor(s)	PricewaterhouseCoopers EU Services EEIG Statutory registration number 0872 793 825 Culliganlaan 5, B-1831 Machelen VAT registration number BE 08727

¹ Regulation 2018/1725 on the protection of natural persons with regard to the processing of personal data by the EU institutions, bodies, offices and agencies.

7.	Data Protection Officer (DPO)	EDPB Data Protection Officer Edpb-dpo@edpb.europa.eu Rue Montoyer, 30 Belgium, Brussels
8.	Description of the processing operation	<p>In accordance with Article 71(1) GDPR, the EDPB is required to draw up an annual report regarding the protection of natural persons with regard to processing in the Union and, where relevant, in third countries and international organisations. The report is made public and transmitted to the European Parliament, to the European Council and to the European Commission. Article 71(2) GDPR provides for the duty to include in the annual report a review of the practical application of the guidelines, recommendations, and best practices as well as the binding decisions issued by the EDPB.</p> <p>As part of its methodology for producing this report, the EDPB will consult a selected number of interested stakeholders and parties, giving them the opportunity to provide their views (annual stakeholders' survey). The use of the annual stakeholders' survey is in line with the methodology used in previous reports. Information which is gathered from the annual stakeholders' survey will only be included in the annual report in an aggregated form, without any possibility of identifying the respondents.</p> <p>The EDPB, as data controller, appointed PricewaterhouseCoopers EU Services as processor to contact selected stakeholders, and to collect and compile their responses to the survey.</p> <p>PricewaterhouseCoopers EU Services acts as a processor for the purposes of this processing operation, on behalf and under the documented instructions of the EDPB. PricewaterhouseCoopers EU Services is bound by a contract and is subject to all requirements foreseen for processors under Regulation (EU) 2018/1725², in particular under Article 29 of this Regulation ("Processor"), including the obligations on security and confidentiality.</p>

² 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.

9.	Purpose of processing operation	<p>The processing of personal data is carried out in order to:</p> <ul style="list-style-type: none"> a) identify relevant stakeholders for the annual stakeholders' survey; b) contact stakeholders with a request to provide replies to the survey; c) where the stakeholders agree to provide replies, collect their replies either in writing or by means of a telephone interview; d) compile the replies to the annual stakeholders' survey; and e) include these views in the EDPB's annual report.
10.	Legal basis	<p>The legal basis of the processing is Article 5(1)(a) and 5(2) ("Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body") of Regulation (EU) 2018/1725. In particular, this task is provided in Article 71(2) of Regulation (EU) 2016/679, according to which the annual report prepared by the EDPB "<i>shall include a review of the practical application of the guidelines, recommendations and best practices referred to in point (l) of Article 70(1) as well as of the binding decisions referred to in Article 65</i>". For the processing of any political views which the data subject might refer to when replying to the survey, which are defined as special category personal data, the EDPB relies on Article 10(2)(g) Regulation (EU) 2018/1725.</p> <p>In addition, the EDPB may be required to store and further process personal data in the context of any audits or enquiries by specific EU bodies, when it handles requests for access to documents under Regulation (EC) 1049/2001³, or if data subjects request to exercise their rights under Regulation (EU) 2018/1725. In such cases, lawfulness of processing is based on the necessity of such processing for compliance with a legal obligation to which the EDPB is subject under Article 5(1)(b) and 5(2) of Regulation (EU) 2018/1725. The legal obligations are foreseen in different legislation applicable to the different institutions responsible for auditing and inspections. For the processing of any political views that the data subjects might refer to when replying to the survey, depending on the purpose, Article 10(2)(f) and (g) Regulation (EU) 2018/1725 may apply.</p>
11.	Description of categories of data subjects	<p>The processing activity will include data subjects who can provide feedback on the practical application of the guidelines, recommendations, and best practices as well as the binding decisions issued by the EDPB. Data subjects will be contacted from the following categories of stakeholders:</p>

³ Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents.

		<ul style="list-style-type: none"> • Public sector; • Academia; • Private sector; and • Non-governmental organisations. <p>Their personal data are processed because they have been selected as relevant stakeholders for the annual stakeholders' survey and who may additionally provide replies to the survey.</p>
12.	Description of processed personal data / categories	<p>We process the following personal data from respondents:</p> <ul style="list-style-type: none"> ○ name and surname; ○ contact details, such as e-mail address and phone number; ○ professional work title (where relevant); ○ the data subject's organisation's name, type and sector (where relevant); and ○ the replies, if the respondent agrees to participate in the survey, including any political views that they might share in their replies.
13.	Description of procedure to ensure data subjects' rights	A specific privacy statement detailing this processing will be published on the EDPB website.
14.	Description of recipients of personal data	<ul style="list-style-type: none"> • The PricewaterhouseCoopers EU Services team responsible for contacting stakeholders and for collecting and compiling the replies to the survey, as a processor; • Members of the public in the context of requests for access to documents, where necessary, in accordance with the provisions of Regulation (EC) 1049/2001 or Council Regulation (EEC, Euratom) 354/83⁴.
15.	Description of transfers	No personal data are subject to international transfers.

⁴ Council Regulation (EEC, Euratom) No 354/83 of 1 February 1983 concerning the opening to the public of the historical archives of the European Economic Community and the European Atomic Energy Community ("Regulation on historical archives").

16.	Description of envisaged time limits for retention for each processing operation	<p>If data subjects do not agree to provide replies to the survey, their personal data will be deleted immediately.</p> <p>If data subjects agree to provide replies to the survey, their personal data will be kept for 5 years following the year in which the annual report is published on the EDPB's website. At the end of this retention periods, if the personal data are contained in documents with historical or administrative value which are selected for preservation in the EDPB records, the selected personal data will be kept indefinitely and – unless an exemption applies – will be made public in accordance with Regulation (EEC, EURATOM) 354/83 on the opening to the public of historical archives after 30 years.</p>
17.	General description of technical and organisational security measures referred to in Article 33	<p>PricewaterhouseCoopers EU Services processes personal data on behalf of the EDPB (within the scope described under 9 above) to which it is bound by a contract. As a processor, PricewaterhouseCoopers EU Services is required to act solely under the instructions of the EDPB, and it is subject to all requirements foreseen for processors under Regulation 2018/1725, in particular under Article 29 ("Processor"), including those of security and confidentiality. PricewaterhouseCoopers EU Services must adopt appropriate technical and organisational security measures, giving due regard to the risks inherent in the processing and to the nature, scope, context and purposes of processing.</p> <p>Any personal data collected by the EDPB is kept on servers with restricted access that are available only to authorised staff through adequate IT security measures. In general, technical measures include appropriate actions to address online security, protect server hardware, software and the network from accidental or malicious manipulations and risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed.</p> <p>Physical access to the EDPB premises is restricted to authorised staff and EDPB members.</p>