

EDPB Personal data records of processing activities - proposed structure (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	Processing of personal data in the context of the Support Pool of Experts initiative
2.	Number of record	EDPB-13
3.	Last updated	April 2025
4.	Data controller	European Data Protection Board Edpb@edpb.europa.eu Rue Montoyer, 30 Belgium, Brussels
5.	Joint controllers	EDPS - the definition of responsibilities is stipulated in the Memorandum of Understanding between the EDPS and the EDPB (see: https://edpb.europa.eu/our-work-tools/our-documents/memorandum-understanding/memorandum-understanding_en), in particular Section VI (“provide financial resources and support to the EDPB and the Secretariat”).
6.	Processor(s)	European Parliament, European Commission, both responsible for the provision of different technical services.

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>The EDPB launched, in 2020, the Support Pool of Experts (“SPE”) initiative, aimed at creating a pool of experts established in the context of the EDPB in order to assist with the carrying out of investigations and enforcement activities of significant common interest, comprising both EDPB experts and external experts. This is done in line with the EDPB tasks stipulated in Article 70(1)(u) GDPR (“promote the cooperation and the effective bilateral and multilateral exchange of information and best practices between the supervisory authorities”).</p> <p>This processing operation concerns the selection and management of EDPB and external experts for the SPE.</p>
9.	Purpose of processing operation	Selection and management of EDPB and external experts for the Support Pool of Experts, including all administrative and financial-related aspects.
10.	Legal basis	The lawfulness of processing is ensured by compliance with Article 5(1)(a) (“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 2018/1725. As required by Article 5(2), the basis for the processing is required to be laid down in Union law, which, in this case, is Article 70(1)(u) GDPR for the cooperation among SAs, but also on the Financial Regulation, for any aspects concerning reimbursements of external experts. ²

² See REGULATION (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012. This Regulation lays down the rules for the establishment and the implementation of the general budget of the European Union and of the European Atomic Energy Community (‘the budget’) and the presentation and auditing of their accounts.

		Where the EDPB is required to process personal data for the purposes of requests for access to documents in accordance with Regulation 1049/2001 ³ or of publication of personal data as a result of the attribution of a specifically valued contract (in accordance with Article 38 of Regulation 2018/1046, also known as EU Financial Regulation), the lawfulness of said processing rests on Article 5(1)(b) and (2) of Regulation 2018/1725, with the legal basis being laid in applicable Union acts regulating such activities.
11.	Description of categories of data subjects	EDPB and external individuals, with a specific expertise, who wish to participate in the Support Pool of Experts initiative.
12.	Description of processed personal data / categories	<p>EDPB experts and their contact points at SAs:</p> <ul style="list-style-type: none"> • Name, surname, email, country, and telephone number of a contact point in each SA; • Name, surname, email, country, postal address, professional work title and any other relevant personal data of the SAs' expert(s) which is necessary for the performance of the tasks that are assigned to the expert in the context of the SPE's activities (e.g. field of expertise, past experience). Where applicable, financial information required for the reimbursement of any expenses incurred in the context of an expert's work at the SPE (within the settled limitations). <p>External experts:</p> <ul style="list-style-type: none"> • Full name, email address, personal or office address, telephone number, personal signature; • All personal data present in an identification document required for participation in the call for expressions of interest ("CEI"); • Qualifications for the performance of the tasks, including those provided by means of an application, a professional certification, a self-assessment of expertise, a CV and/or a letter of motivation; • Declaration of honour and any related personal data provided as supporting evidence;

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, OJ L 145, 31.5.2001, p. 43–48.

		<ul style="list-style-type: none"> Any additional personal data required for participation in the CEI and in any simplified tender procedure to be an SPE expert, including any financial, tax and legal data required by the EDPB / EDPS, for purposes such as reimbursement of costs and fees, where applicable; Any other personal data an expert or applicant might share with the EDPB when exchanging on their case. <p>Where publication of the experts' personal data is required (in accordance with Article 38 of Regulation 2018/1046), the following data categories are published: name and origin of the expert, together with the value and subject of the contract.</p>
13.	Description of procedure to ensure data subjects' rights	<p>Two specific privacy statements, one for external experts and another for EDPB experts, have been created and will be made available to all applicants via the appropriate channels (e.g. EDPB website). Said privacy statements detail how data subjects can exercise their rights.</p> <p>Data processed for the purposes of the selection and management of experts is kept on restricted, password-protected servers, available only to EDPB staff and EDPB members, on a need-to-know and need-to-do basis. Physical access to the premises of the EDPB is protected, and restricted to authorised personnel.</p> <p>Submission of applications will be made using a Commission tool (EU Survey) with restricted access only to staff members with a need to know.⁴ The assessment of any applications submitted will be subject to strict confidentiality rules, applicable to all those involved in the selection process. Data will be kept in EU Survey only for the amount of time necessary to analyse the results of the procedure, after which it will be transferred to EDPB (and, where applicable, EDPS) servers and deleted from EU Survey.</p> <p>Reimbursements of EDPB experts, conducted mainly by EDPS staff, will take place with resort to a specific set of restrictions and safeguards embedded in the chosen procedure / IT tool. The EDPS may also resort to specific internal tools for administrative management of the procedures. Because this procedure is handled mainly by the EDPS, specific information on how the EDPS handles personal data in this context is also provided in the privacy notices, namely by making reference to their two specific privacy statements on the matter (please see: https://edps.europa.eu/data-protection/our-work/publications/data-protection-notices/financial-</p>

⁴ For more information on how EU Survey processes personal data, please see: <https://ec.europa.eu/eusurvey/home/privacystatement>.

		<p>managementtransactions_en and https://edps.europa.eu/data-protection/our-work/publications/data-protection-notice/data-protection-notice-financial_en</p> <p>In case of request, personal data can only be disclosed to recipients other than EU institutions and bodies in compliance with Article 9 of Regulation 2018/1725, and provided that the data subjects have been informed about the processing and about their right to object (Articles 15-16 and 23 of the Regulation).</p>
14.	Description of recipients of personal data	<ul style="list-style-type: none"> • EDPS staff members, for purposes related to their role as joint controllers, namely EDPS management, EDPS teams in charge of finance, as well as, where relevant, the EDPS DPO team; • The European Commission, acting as a processor for the provision of technical services, where relevant and necessary; • The European Parliament, acting as a processor for the provision of technical services, where relevant and necessary; • Members of the public in the context of requests for access to documents, where the relevant exceptions do not apply, in accordance with Regulation 1049/2001, or of mandatory publication of the experts data, where applicable.
15.	Description of transfers	No international transfers are foreseen in the context of this processing operation.
16.	Description of envisaged time limits for retention for each processing operation	<p>Personal data of applicants will be kept in EU Survey only for the amount of time necessary for the assessment of their applications, after which it will be transferred to the EDPB (and, where applicable, EDPS servers) and deleted from EU Survey. The following retention periods then apply:</p> <p>The personal data of SAs' points of contact will be kept for as long as the individual is a point of contact / for the duration of the SPE initiative (expert lists are kept for two years from the date of publication, and can be extended for another two). Points of contact are transmitted by SAs on a voluntary basis, so any information concerning a specific point of contact will be deleted in case an SA decides to change its point of contact and once it officially informs the EDPB Secretariat.</p> <p>Personal data of experts will be kept for the duration of the SPE procedure they are a part of, either via direct involvement in a project or simply being part of the pool of experts, in accordance with the principle of data</p>

		<p>minimisation. Financial data will be kept for 7 years after the signature of the contract, after which they will be destroyed. Where personal data has to be published in accordance with the CEI, said personal data will be removed two years after the year of the award.</p> <p>Personal data of experts who are not selected after a specific procedure will be kept for a maximum of 5 years after the closure of the call for expressions of interest. In any case, personal data contained in supporting documents are deleted where possible, in particular in cases where these data are not necessary for budgetary discharge, control and audit purposes.</p>
17.	General description of technical and organisational security measures referred to in Article 33	<p><u>IT Measures</u></p> <p>Any personal data collected by the EDPB is kept in restricted access servers, available only to authorised staff through adequate IT security measures. In this particular case, access is restricted to the assigned team members. 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. Relevant “physical and/or IT security” measures have been applied. Suitable safeguards are in place (please note that the exact details cannot be published, in order to protect the process).</p> <p><u>Organisational measures</u></p> <p>Physical access to the EDPB premises is restricted to authorised staff and EDPB members.</p>