

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-16
3.	Last updated	November 2025
4.	Data controller	European Data Protection Board Edpb@edpb.europa.eu Rue Montoyer, 30 Belgium, Brussels
5.	Joint controllers	European Data Protection Supervisor (EDPS) Postal address: Rue Wiertz 60, B-1047 Brussels Office address: Rue Montoyer 30, B-1000 Brussels Telephone: +32 2 283 19 00 Email: edps@edps.europa.eu

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.

		Operational controller: HRBA (EDPS-Procurement@edps.europa.eu) Contact form for enquiries on processing of personal data to be preferably used: https://www.edps.europa.eu/about-edps/contact_en
6.	Processor(s)	European Parliament, European Commission, both responsible for the provision of different technical services.
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	In 2020 the EDPB launched the Support Pool of Experts (“SPE”) initiative, aimed at creating a pool of experts to assist with the carrying out of investigations and enforcement activities of significant common interest among the EDPB members. The selection of experts is made through a call for expression of interest (“call”). Individuals who apply and who meet the criteria provided in the call are included on a reserve list and depending on the needs of the EDPB could be assigned carrying out specific tasks (“projects”) following the signature of a contract.
9.	Purpose of processing operation	The purpose of this processing is to select and manage the experts who are included on the SPE reserve list and awarded SPE projects, as well as to manage such projects.
10.	Legal basis	The lawfulness of the 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 (EU) 2018/1725. In particular, this task is provided in Article 70(1)(u) of Regulation (EU) 2016/679, according to which the EDPB shall “promote <i>the cooperation and the effective bilateral and multilateral exchange of information and best practices between the supervisory authorities</i>”. If the EDPB decides to publish the SPE deliverables (i.e. reports) of a completed SPE project, the personal data of the expert who worked on the project (e.g. name, surname, title, reference to the fact that they worked on the project

		as part of the SPE, etc.) will be published subject to the consent of the expert, in line with Article 5(1)(d) of Regulation (EU) 2018/1725. On the basis of the expert's consent, in line with Article 5(1)(d) of Regulation (EU) 2018/1725, the EDPB may contact them and inform them of events and publications from the EDPB or its members if the EDPB considers that such events and publications may be of interest to the expert. Where the EDPB is required to process personal data to comply with a legal obligation (e.g., when a relevant EU body such as the European Court of Auditors carries out an audit or investigation, or for the purposes of requests for access to documents in accordance with Regulation (EC) 1049/2001²) the lawfulness of said processing rests on Article 5(1)(b) and (2) of Regulation (EU) 2018/1725.
11.	Description of categories of data subjects	Individuals, with a specific expertise, who wish to participate in the Support Pool of Experts initiative.
12.	Description of processed personal data / categories	To organise and manage the SPE, the following personal data are processed on a need-to-know-basis: • Full name, email address, professional or personal address and telephone number (mandatory to complete the application); • Information on qualifications for the performance of the tasks and activities described in the call. This includes the information that are required to provide as part of the application, such as fields of expertise, a self-assessment of expertise, language level, and CV (mandatory to complete the application); • Information that the individual can voluntarily provide regarding professional and academic titles, diplomas, professional certifications, current position, activities and responsibilities, keywords that define their expertise, information on previous projects, experiences and publications, a letter of motivation, and/or any other supporting document (optional to complete the application); • The signed declaration of honour (mandatory to complete the application);

² 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.

		• Whether and when the individual was accepted in previous SPE reserve lists (optional to complete the application); • Any additional personal data required for participation in the call and in any 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. This includes an identification document and bank account reference for experts who are awarded an SPE project (mandatory to award an SPE project); • A contribution ID is associated with each application form (automatic attribution); • Any other personal data an expert or candidate might share with us, when submitting their application and/or upon exchanging on their case (optional); • Assessment of the application (mandatory as part of processing the application).
13.	Description of procedure to ensure data subjects' rights	A specific privacy statement containing details on how data subjects can exercise their rights is available both on the EDPB website and the EU Survey, via which the applications will be submitted. With regard to reimbursements of EDPB experts, conducted mainly by EDPS staff, information on how the EDPS handles personal data in this context is provided in a separate private notice: https://edps.europa.eu/data-protection/our-work/publications/data-protection-notices/data-protection-notice-financial_en
14.	Description of recipients of personal data	• EDPS staff members, for purposes related to their role as joint controllers in relation to the public procurement management aspects; • The European Commission: ○ acting as a processor for the provision of technical services including in relation to EU Survey; and/or ○ acting as a separate controller for processing it carries out for its own purposes in relation to EU Survey and EU Login; • The European Parliament: ○ acting as a processor, for the provision of technical services including Webmeeting, where relevant and necessary; ○ acting as a separate controller upon providing Cisco Webex³; and

³ For more information on processing of personal data via Cisco Webex, please consult the European Parliament (hereinafter “EP”) data protection statement

		- Members of the public, only to the extent necessary: - 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, - where applicable in the context of mandatory publication of the experts' data in line with the Financial Regulation, or - where the expert who worked on an SPE project consents to the publication of their personal data when the EDPB publishes such deliverable.
15.	Description of transfers	No personal data are subject to transfers outside of the EEA.
16.	Description of envisaged time limits for retention for each processing operation	The period during which we will keep personal data will depend on whether or not an application to be included in the SPE is successful: - If such application is rejected and therefore the individual does not join the SPE, personal data are kept for 5 years from the closure of the call procedure. - If such application is successful and the individual is included on the SPE reserve list, the EDPB will keep the personal data for 5 years following the end date of the validity of the list; and - If in addition to having been included on the SPE reserve list, the EDPB/EDPS sign a contract with the individual, personal data will be kept for 10 years from the last financial transaction. If personal data are relevant for the establishment, exercise or defence of legal claims, the EDPB will keep them for the period of the dispute, even if this is longer than the above retention periods. At the end of the retention period mentioned under b. and c. above, if the personal data are contained in documents with historical or administrative value which are selected for preservation in the records of the EDPB, 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.

<https://www.europarl.europa.eu/data-protect/reportPdf/printPrivacyStatement.do;jsessionid=0CC8F364B5DD0BDB79943F458451A72B?prefix=V3&nr=570>

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").

		Reports of completed SPE projects remain on the EDPB website indefinitely and consequently the same applies to the expert's personal data as the author of such a project included therein (e.g. name, surname, title, reference to the fact that was worked on the project as part of the SPE, etc). Such publication of personal data is subject to the expert's consent.
17.	General description of technical and organisational security measures referred to in Article 33	<u>IT Measures</u> 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 systems 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. <u>Organisational measures</u> Appropriate organisational measures have been taken to protect the systems. Physical access to the EDPB premises is restricted to authorised staff and EDPB members.