



European Data Protection Board (EDPB) and European Data Protection Supervisor (EDPS)
Specific Privacy Statement (SPS)

Processing of personal data for the purpose of selecting and managing experts in the context of the Support Pool of Experts (“SPE”)

Last updated: November 2025

INDEX

1. Introduction
2. Who is responsible for the processing of your personal data and under which legal grounds are they processed?
3. What personal data do we collect, for what purpose, and through which technical means?
4. Are your personal data transferred outside of the EEA?
5. Who has access to your personal data and to whom is it disclosed?
6. How do we protect and safeguard your personal data?
7. For how long do we keep your personal data?
8. How can you verify, modify or delete your personal data?
9. How long do you have to wait to receive our reply to your data subject rights’ request?
10. Who can you contact to ask questions or exercise your rights?
11. Who can you contact to complain about the processing of your personal data?

1. Introduction

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.

This privacy statement explains how the EDPB and the EDPS (“**we**”/“**us**”/“**our**”) process your personal data in the context of the SPE.

2. Who is responsible for the processing of your personal data and under which legal grounds are they processed?

The EDPB and the EDPS are joint controllers responsible for the organisation and management of the SPE, including the selection of experts on the reserve list and assignment of projects to some of them. In particular, the EDPS is responsible for the administrative and financial aspects of the call in line with the provisions of Regulation (EU, Euratom) 2024/2509 (“**Financial Regulation**”)¹.

The legal basis of the processing is 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) 2018/1725².

- With regard to the processing by the EDPB, this task is provided in Article 70(1)(u) of Regulation (EU) 2016/679³ according to which the EDPB shall “*promote the cooperation and the effective bilateral and multilateral exchange of information and best practices between the supervisory authorities*”.
- With regard to the processing by the EDPS, such processing stems from the provisions of Article 75 of Regulation (EU) 2016/679 and Article 57(1)(l) of Regulation (EU) 2018/1725, according to which the EDPS should provide the secretariat of the EDPB. Processing of personal data by the EDPS relates to the management and functioning of the EDPS including the EDPB Secretariat. Recital 22 of Regulation (EU) 2018/1725 clarifies that “*Processing of personal data for the performance of tasks carried out in the public interest by the Union institutions and bodies includes the processing of personal data necessary for the management and functioning of those institutions and bodies.*” Processing of personal data for financial purposes (i.e. reimbursement of experts) is done by the EDPS in accordance with the provisions of the Financial Regulation.

Where we decide to publish the SPE deliverable(s) 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.) is published subject to the consent of the expert, in line with Article 5(1)(d) of Regulation (EU) 2018/1725.

¹ See Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union, available at <https://eur-lex.europa.eu/eli/reg/2024/2509/oj/eng>. 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 and the presentation and auditing of their accounts.

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, available at <https://eur-lex.europa.eu/eli/reg/2018/1725/oj/eng>.

³ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), available at <https://eur-lex.europa.eu/eli/reg/2016/679/oj/eng>.

On the basis of your consent, in line with Article 5(1)(d) of Regulation (EU) 2018/1725, we may contact you regarding events and publications from the EDPB or our members if we consider that such events and publications may be of interest to you.

Where we are 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) 1049/2001⁴), the lawfulness of said processing rests on Article 5(1)(b) and (2) of Regulation (EU) 2018/1725.

3. What personal data do we collect, for what purpose, and through which technical means?

3.1 Processed personal data

We process the following personal data on a need-to-know-basis:

- Full name, email address, professional or personal address and telephone number (mandatory to complete your application);
- Information on your 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 your field(s) of expertise, a self-assessment of your expertise, your language level and your CV (mandatory to complete your application);
- Information that you can voluntarily provide regarding your professional and academic titles, diplomas, professional certifications, current position, activities and responsibilities, keywords that define your expertise, information on previous projects, experiences and publications, a letter of motivation, and/or any other supporting document(s) (optional to complete your application);
- The signed declaration of honour (mandatory to complete your application);
- Whether and when you were accepted in previous SPE reserve lists (optional to complete your 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 your application (mandatory as part of processing your application).

Where publication of the experts' personal data is required in accordance with Article 38 of the Financial Regulation, the following data categories are published on the website of the

⁴ 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.



EDPS⁵: name and region of origin of the expert, together with the amount and subject of the contract.

3.2 Purpose of the processing

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.

3.3 Technical means

The selection and management of experts on the SPE reserve list, and the management of SPE projects, use specific IT tools for the secure submission and assessment of applications. Exchanges may take place via email, videoconferencing systems (e.g., Webmeeting or CISCO Webex) or other tools made available for this purpose. Additional internal IT tools may be used for the performance of administrative tasks, including storage of relevant information.

Submissions of applications are made using EU Survey, which is a tool of the European Commission⁶. Applicants' personal data are kept in EU Survey for the duration of the call plus three months following the end of the call, to allow experts on the reserve list to retrieve any information from their application and apply to a possible future similar call.

The European Commission acts as a processor by providing us with this EU Survey. Please note that upon using EU Survey, the European Commission may gather your personal data for its own purposes, in which case it is controller for that separate processing⁷.

The authentication tool used to reply via EU Survey is EU Login. This is a tool of the European Commission for which the European Commission is a separate controller⁸.

As of 2026, the EDPS will use the financial and accounting system "SUMMA", managed by the European Commission. The European Commission (DG BUDG) is a processor of the EDPS for all data processing on SUMMA, except for the registration of new "Business Partners" (also named as "Legal Entity" or "Bank Account" record) for which it is a joint controller of the EDPS.

4. Are your personal data transferred outside of the EEA?

No personal data are subject to transfers outside of the EEA.

⁵ https://www.edps.europa.eu/about-edps/public-procurement_en.

⁶ For more information on how EU Survey processes your personal data, please see: <https://ec.europa.eu/eusurvey/home/privacystatement>.

⁷ For more information on the processing of personal data by EU Survey of the European Commission you may read <https://ec.europa.eu/eusurvey/home/dpa> and <https://ec.europa.eu/eusurvey/home/privacystatement>.

⁸ For more information, please consult the relevant record of the EC, DPR-EC-03187.1, available at <https://ec.europa.eu/dpo-register/detail/DPR-EC-03187>.

5. Who has access to your personal data and to whom is it disclosed?

Your personal data may be disclosed to the following:

- EDPB members may have access to the personal data of experts who are shortlisted for a project they proposed, or who have been awarded an SPE contract for a project proposed or followed by that EDPB member. EDPB members are also informed about the awarded projects and which experts have been engaged;
- EDPB Secretariat staff members, on a need-to-do and need-to-know basis;
- EDPS staff members, for purposes related to their role as joint controllers for the administrative and financial aspects of the call in line with the provisions of the Financial Regulation;
- The European Commission:
 - acting as a processor, for the provision of technical services including EU Survey;
 - acting as a separate controller for processing it carries out for its own purposes in relation to EU Survey and EU Login;
 - acting as a joint controller of the EDPS for the registration of Business Partners in SUMMA; and/or
 - as a processor of the EDPS for all other processing on SUMMA;
- 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 Webex⁹; and
- 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) 354/83¹⁰,
 - 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.

6. How do we protect and safeguard your personal data?

Any personal data we collect is kept on servers with restricted access that are 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 protect 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.

⁹ For more information on processing of personal data via Cisco Webex, please consult the European Parliament (hereinafter “EP”) data protection statement

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

¹⁰ 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”).

Appropriate organisational measures have been taken to protect the systems. Physical access to our premises is restricted to authorised staff and EDPB members.

Reimbursements of external 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 tool¹¹.

7. For how long do we keep your personal data?

The period during which we keep your personal data depends on whether or not your application to be included on the SPE reserve list is successful, as well as whether or not we sign a contract with you to award you an SPE project:

- a. If your application is rejected and therefore you do not join the SPE reserve list, we retain your personal data for 5 years from the closure of the call procedure.
- b. If your application is successful and you are included on our SPE reserve list, then we keep your personal data for 5 years following the end date of the validity of the list; and
- c. If in addition to having been included on our SPE reserve list, we sign a contract with you to award you an SPE project, your personal data are kept for 10 years from the last financial transaction.

Please note that data are kept until the end of a possible audit¹² if such an audit starts before the end of the above period.

In accordance with Article 38(7) of the Financial Regulation, where personal data have to be published under Article 38 of the Financial Regulation, we shall remove your personal data from that publication two years after the end of the financial year in which the funds were legally committed.

Please note that if your personal data are relevant for the establishment, exercise or defence of legal claims, we 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 our 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.

Deliverables (e.g., reports) of completed SPE projects remain on the EDPB website indefinitely, which includes your personal data (e.g. name, surname, title, reference to the fact

¹¹ For more information on how the EDPS processes personal data in this context, please see: https://edps.europa.eu/data-protection/our-work/publications/data-protection-notices/data-protection-notice-financial_en

¹² An audit can be launched by the EDPS, OLAF (European Anti-fraud Office), the European Court of Auditors and/or the Internal Audit Service of the European Commission.

that you worked on the project as part of the SPE, etc) if you have consented to the publication of your personal data for that purpose.

8. How can you verify, modify or delete your personal data?

As the individual to whom the personal data relate, you can exercise the following rights:

1. access your personal data under Article 17 of Regulation (EU) 2018/1725;
2. rectify your personal data under Article 18 of Regulation (EU) 2018/1725;
3. erase your personal data under Article 19 of Regulation (EU) 2018/1725;
4. restrict the processing concerning yourself under Article 20 of Regulation (EU) 2018/1725; or
5. exercise the right to data portability under Article 22 of Regulation (EU) 2018/1725.

Please note that these rights are not absolute rights, which means that some exceptions may apply. Please also note that, in certain cases, as provided in Article 25 of Regulation (EU) 2018/1725, restrictions of data subjects' rights may apply. These rights are applied on a case-by-case basis.

With regard to exercising your right to rectification, please note that until the expiration of the validity of the reserve list you can independently correct or update any information that you submit on EU Survey with the exception of your email address, for which you will need to contact the EDPB by email at edpb@edpb.europa.eu (adding the tag [SPE] in the subject line) to ensure that your email address is appropriately updated in our databases. To correct any other information of yours, (e.g. information contained in or relating to procurement documents created as part of signing a contract with you) please refer to points 9 and 10 below.

In addition, where applicable, you can object to the processing of your personal data for reasons relating to your particular situation. When you contact us to exercise this right, please explain these reasons. We will remove your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms.

For the publication of the SPE deliverable(s) of a completed SPE project for which you consented to have your personal data published, you can withdraw your consent at any time, without any consequence, and as easily as you have provided it (i.e. by sending an email to the contacts indicated in section 10 below). In addition, you can withdraw your consent relating to the receipt of information regarding events and publications from the EDPB and its members at any moment by unchecking the relevant boxes in EU Survey. However, please be aware that withdrawing your consent will not affect the lawfulness of the processing based on your consent prior to withdrawing it.

We do not use your personal data for automated decision-making.

To exercise your rights as a data subject, please see sections 9 and 10 below.



9. How long do you have to wait to receive our reply to your data subject rights' request?

After we receive your request, we have one month to provide information on action taken on your request. We may extend this period by two further months, taking into account the complexity and number of the requests. In such cases, we will inform you of the extension and the reasons for it within one month of receiving your request.

10. Who can you contact to ask questions or exercise your rights?

According to the duty of Article 28 of Regulation (EU) 2018/1725, the EDPB and the EDPS have chosen to designate the EDPB as your contact point. Therefore, in case you have any questions, or wish to exercise your rights as a data subject, please contact us at edpb@edpb.europa.eu or via our [website's](#) contact page (selecting the option "Requests for the EDPB DPO").

11. Who can you contact to complain about the processing of your personal data?

We encourage you to always contact us first as described under point 10 above to raise your questions or concerns.

In any case, you remain entitled to send a complaint to the EDPS, as a supervisory authority, using the following contact information:

European Data Protection Supervisor (EDPS)
Rue Wiertz 60
B-1047 Brussels, Belgium
edps@edps.europa.eu