

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	Events with stakeholders including meetings and written exchanges such as via surveys/questionnaires
2.	Number of record	EDPB-18
3.	Last updated	September 2026
4.	Data controller	European Data Protection Board Edpb@edpb.europa.eu Rue Montoyer, 30 Belgium, Brussels
5.	Joint controllers	The EDPS for the purposes of reimbursing travel costs via the AGM tool.

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.

		The European Commission or the Authority for Anti-Money Laundering and Countering the Financing of Terrorism (AMLA) for events with stakeholders that the EDPB organises jointly with the European Commission or AMLA respectively.
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 order for the European Data Protection Board (“the EDPB”) to be able to fulfil its tasks, as they are prescribed in Articles 70 and 71 GDPR, it organises events, meetings or holds written exchanges with stakeholders, such as civil society organisations, businesses, or public authorities, including data protection supervisory authorities from any country in the world, to exchange views, information and expertise on topics which are of interest to the work of the EDPB. Such events or meetings can be in person or online, and such written exchanges may include emails, surveys and questionnaires.
9.	Purpose of processing operation	To exchange views, information or expertise through events, meetings or written exchanges, including surveys and questionnaires, with stakeholders, on subject matters falling under the work of the EDPB, and to help further the EDPB’s work on these topics. Where the participant provides their consent, their name, contact details and professional affiliation will also be processed for the purpose of informing them about future EDPB events and initiatives. Where the participant provides their consent, photographs and videos of that participant may be used for communication purposes, including in publications on the EDPB website and the EDPB social media accounts

10.	Legal basis	For the organisation, management, running and follow-up of an event, meeting or written exchange with stakeholders, including cooperating with public authorities, the EDPB processes personal data 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 under Article 5(1)(a) and (2) of Regulation (EU) 2018/1725². More specifically, events, meetings and written exchanges with stakeholders are organised in order for the EDPB to fulfil its tasks under Articles 70 and 71 GDPR. The EDPB relies on Article 10(2)(e) of Regulation (EU) 2018/1725 for the processing of any special categories of personal data³ which participants might include when taking the floor in a stakeholders event or in the chat function of the conference tool. When participants include such categories of personal data in written exchanges with the EDPB including upon providing feedback in a follow up action, the EDPB relies on Article 10(2)(g) of Regulation (EU) 2018/1725. The names of participants from a data protection supervisory authority may be shared with the other participants to the stakeholders event 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 under Article 5(1)(a) and (2) of Regulation (EU) 2018/1725. The names of other types of stakeholders (e.g., from a civil society organisation or a business) may be shared with the other participants to the stakeholders event on the basis of their consent (Article 5(1)(d) of Regulation (EU) 2018/1725). On the basis of the participants' consent, in line with Article 5(1)(d) of Regulation (EU) 2018/1725, the EDPB may include them on a contact list in order to inform them of future initiatives and events that the EDPB may organise, as well as for the publication and dissemination of results from the event (where applicable).
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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 (Text with EEA relevance.).

³ That is "personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. See Article 10(1) of Regulation (EU) 2018/1725.

		Participants can be included in photos and videos, on the basis of their consent in line with Article 5(1)(d) and Article 7 of Regulation (EU) 2018/1725. Such content is used for communication purposes including in publications on the EDPB website and the EDPB social media accounts. 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) 1049/2001⁴), the lawfulness of such processing rests on Article 5(1)(b) and (2) of Regulation (EU) 2018/1725. For the processing of any special categories of personal data, participants might refer to when taking the floor in the event or meeting or in the chat function of the conference tool or upon providing feedback in a follow up action, depending on the purpose, Article 10(2)(f) and (g) Regulation (EU) 2018/1725 may apply.
11.	Description of categories of data subjects	Participants and potential participants of an EDPB stakeholders event.
12.	Description of processed personal data / categories	To organise stakeholder events or meetings, including, where relevant, sending invitations and calls for expression of interest in participating, as well as to gather and/or exchange written views, information or expertise with stakeholders, such as via a survey or a questionnaire, and to carry out any follow up actions, the EDPB may process the following personal data on a need-to-know basis: (a) name and surname; (b) email address; (c) professional affiliation and sector of employment; (d) role/occupation/title; (e) professional address and phone number; (f) banking data, where reimbursement is foreseen;

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.

	(g) where the event or meeting is held remotely, any personal data required by service providers (e.g. videoconferencing providers) to ensure participation in the event or meeting; (h) photo and biography of the speakers for reference; (i) material (e.g. slides) that may be shared with participants after the event or meeting, in case such material includes personal data; (j) any views expressed or any comments that participants may type in the chat function of the conferencing tool; (k) photographs and audio-video recording of speakers participating in the panel, as well as of participants to the event and in Q&A sessions; (l) any views expressed in follow up actions after the event or meeting. Certain information such as email addresses of participants invited to the stakeholders' event or meeting may be collected from publicly available sources and will be deleted within one month from the time of the first communication should the recipient refuse participation or in case of no reply. Participants joining online have the option to deactivate their cameras if they do not wish to be seen. The EDPB does not require the processing of any confidential information or special categories of personal data. For this reason, participants and speakers are not required or expected to include such information or data in views, substantive contributions and/or expertise expressed in connection to the stakeholders' event – including those expressed orally during the event, those shared in writing through the chat function of conferencing tool, or those otherwise shared by writing. The EDPB may create summaries of the contributions from participants to the stakeholders event or meeting, including contributions provided in written form via the chat function of the conferencing tool and contributions in written exchanges with us or in feedback provided in follow up actions. These summaries will be written in a general form which does not allow for the identification of individual contributors, with contributions being aggregated where appropriate. Such summaries could be communicated to the EDPB members or become public such as statistics or reports.
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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 on the EDPB website.
14.	Description of recipients of personal data	• The EDPS, as a joint controller for the purposes of reimbursing travel costs via the AGM tool; • Where appropriate, the other participants to the stakeholders' event; • The European Commission: ○ acting as a processor in relation to EU Survey; and/or ○ acting as a separate controller for Vpass and for any processing it carries out for its own purposes in relation to EU Survey⁵ and EU Login⁶; ○ in particular cases where the event is organised jointly between the EDPB and the European Commission, acting as a joint controller; • The European Parliament: ○ acting as a processor, for the provision of technical services, including Webex meeting, where relevant and necessary; ○ acting as a separate controller in relation to the use of Vpass⁷ and upon providing Cisco Webex⁸;

⁵ 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>

⁶ For more information, please consult the relevant record of the European Commission, DPR-EC-03187.1, available at <https://ec.europa.eu/dpo-register/detail/DPR-EC-03187.1>

⁷ <https://www.europarl.europa.eu/data-protect/reportPdf/printPrivacyStatement.do;jsessionid=538ED3775AF5A0141A05980C26D46A71?prefix=V3&nr=818>

⁸ The European Parliament (EP ITEC) is a controller regarding certain technical and legal aspects of Webex that it decides upon such as, for example, the contractual clauses concluded with Cisco and the technical customisation done at ITEC level, over which the EDPB does not have any control nor the possibility to alter. The EDPB is a controller for the processing of personal data when actively using features in Webex for the event or meeting (this includes for example choices made on the use of the meeting recording feature). For more information on processing of personal data via Cisco Webex, please consult the EP data protection statement:

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

		• In particular cases where a stakeholders event is organised jointly between the EDPB and AMLA, the following entities are recipients: ◦ AMLA, acting as a joint controller; and ◦ The Occupational Pension Authority, in the premises of which the event is held, acting as a separate controller for any processing it carries out for its own purposes⁹; • In case of an online or hybrid event or meeting, the names of the participants joining online (as entered by the participants themselves) may be made available to each participant for the duration of the online or hybrid meeting or event; • In case personal data, such as videos or photos, are published on the X (Twitter) or LinkedIn accounts of the EDPB¹⁰. These companies might carry out further processing of those data for which they are separate controllers¹¹; and • Members of the public: ◦ in case videos or photos of the stakeholders event or meeting are published on the EDPB website and/or EDPB social media accounts, or ◦ in the context of requests for access to documents, in accordance with the provisions of Regulation (EC) 1049/2001 or Council Regulation (EEC, Euratom) 354/83¹².
15.	Description of transfers	For events or meetings organised among data protection supervisory authorities for the purposes of promoting the exchange of views, information or expertise, in line with Article 70(1)(w) GDPR, we might share participants' contact details with the other participating data protection supervisory authorities, to the extent that these supervisory authorities are controllers in countries with which the European Commission has an adequacy decision in line with Article 47 of Regulation (EU) 2018/1725.

⁹ For more information on this processing, please read the relevant record https://www.eiopa.europa.eu/document/download/bfd4bfea-fab0-4c8f-8bcc-20c718933ea2_en?filename=Record_Management%20of%20physical%20access%20to%20the%20EIOPA%20premises.pdf&prefLang=lv

¹⁰ See relevant privacy notices https://www.edpb.europa.eu/system/files/2023-11/edpb_sps_twitter_account_en.pdf and https://www.edpb.europa.eu/system/files/2024-04/20240403_sps_linkedin_page_en.pdf

¹¹ To learn more about how these platforms process your personal data, we encourage you to read their privacy policies <https://www.linkedin.com/legal/privacy-policy> and <https://twitter.com/en/privacy>.

¹² 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.

		For all other events or meetings that are not organised among data protection supervisory authorities for the purposes of promoting the exchange of views, information or expertise, in line with Article 70(1)(w) GDPR, we do not transfer your personal data outside of the EEA.
16.	Description of envisaged time limits for retention for each processing operation	Personal data processed for the purposes of the stakeholders event are kept for 5 years¹³. Any audio-video recording and photos published online by the EDPB will remain available online for as long as they are published. Personal data may be part of documents with historical or administrative value, which are selected for preservation in the EDPB records. In this case, the personal data they contain will be kept indefinitely and – unless an exemption applies – be made public in accordance with Regulation (EEC, EURATOM) 354/83 on the opening to the public of historical archives after 30 years.
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 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.

¹³ An exception is made to contact details on the EDPB Single Contact List, which are kept for as long as data subjects wish to be part of said list or until the EDPB is requested its removal for any additional reasons (e.g. change of contact point).