



European Ombudsman

Secretary General

Personnel, Administration and Budget Unit

European Ombudsman

Public record of processing activity¹:

Residence permits of EO staff members (special cards)

1. Last update of this record: 20.07.20

2. Reference number²: 17/2020

3. Name and contact details of the controller³: European Ombudsman, 1 avenue du Président Robert Schuman, CS 30403, F-67001 Strasbourg Cedex - Contact: Personnel, Administration and Budget Unit (PAB) - HR Sector - EO@ombudsman.europa.eu

Responsible department: Personnel, Administration and Budget (PAB) Unit-HR sector

4. Name and contact details of the Data Protection Officer: Mr Juliano Franco, Dpo-Euro-Ombudsman@ombudsman.europa.eu

5. Name and contact details of the processor⁴: N/A

6. Name and contact details of the joint controller(s)⁵:

- European Parliament (EP) - DG Personnel- Staff Front Office Unit- that deals with the requests for special cards for the staff members assigned in the Brussels Office- contact: PERS-PrivilegesBru@europarl.europa.eu.

- French and Belgian national authorities, which issue the special cards.

¹ To be filled in by the controller. See Article 31(1) and (5) on records of processing activities of Regulation 2018/1725: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

² For tracking. If the office decides to keep a central register, contact the keeper of that register to obtain a reference number.

³ Use functional mailboxes as far as possible to ensure business continuity.

⁴ Where applicable. If you use a processor (contractor) to process personal data on your behalf, please indicate so (e.g. 360° evaluations, outsourced IT services or pre-employment medical checks).

⁵ Where applicable. If you are jointly responsible with another EU institution, please indicate so here (e.g. two institutions with shared medical service). If this is the case, make sure to mention in the description who is in charge of what and who people can address for their queries.



7. Purpose(s) of the processing⁶: Requesting special cards from the French or Belgian Ministry of Foreign Affairs for newly recruited staff members and their family members.

Short description of the processing:

For each newly recruited staff member and their family members (spouse and/or children), PAB Unit- HR sector requests the relevant public authority in which the office is located (France or Belgium) to deliver a special card (“*attestation de fonctions*” for France or “*special identity card*” for Belgium).

- For the special cards delivered by the French Ministry of Foreign Affairs, PAB Unit uses a specific form (see in annex) and encloses supporting documents (copy of passports or ID cards). The special cards are valid for 4 years, after which PAB Unit asks for a renewal to French Ministry of Foreign Affairs. In December each year, PAB Unit sends to the French authority an Excel Table (1) with the list of staff members in service for the relevant year. When the staff member leaves the institution, PAB Unit sends back the relevant special cards to the French public authority and keeps a proof of the sending back in electronic version.

- For the special cards delivered by the Belgium Ministry of Foreign Affairs, the newly recruited staff members contact directly the EP- DG Personnel- Staff Front Office Unit (PERS-PrivilegesBru@europarl.europa.eu), which entirely deals with the requests for the special cards. The Head of PAB Unit then signs the requests. The special identity cards are valid during 5 years.

8. Description of the categories of data subjects and of the categories of personal data⁷:

- Data subjects: staff members of the EO Office (officials, temporary and contract agents), their family members if applicable (spouse and/or children),

- Categories of personal data:

- data on the form used for requesting the special cards (see in annex):
 - concerning the EO staff member: name, surname; date and place of birth; nationality; family situation; function and grade; home address;
 - concerning the spouse and children of the EO staff member: name, surname; date and place of birth; nationality;
- supporting documents to the request: copy of the passport or ID card of the EO staff member and family members for which a special card is requested;
- data on the Excel table sent to the French Ministry of Foreign Affairs: data mentioned above concerning the EO staff member; special card number; date of arrival in France; date of exercise of functions; date of end of validity of the special card.

⁶ Very concise description of what you intend to achieve; if you do this on a specific legal basis, mention it as well (e.g. staff regulations for selection procedures).

⁷ In case data categories differ between different categories of persons, please explain as well (e.g.: suspects vs. witnesses in administrative inquiries)



The staff member of PAB Unit-HR sector further processes an Excel table (2) for managing internally the requests for special cards with the following data: name, surname, number of the card and the date of validity.

9. Time limit for keeping the data and, where possible, for erasure⁸:

Supporting documents collected by the EO for requesting the special cards are deleted as soon as they are issued. The data on the Excel table (1) sent to the French Ministry of Foreign Affairs is deleted at the end of each year. The data on the Excel table (2) used for managing internally the requests for special cards is kept and updated during all the process. Once a staff member leaves the Office, the relevant data is deleted.

10. Recipients of the data⁹: the EO, the Secretary General, the Head of PAB Unit, the Head of HR sector, the staff member of HR sector in charge of dealing with the special cards, the EP relevant services (DG Personnel- Staff Front Office Unit), the French and Belgian Ministries of Foreign Affairs.

11. Are there any transfers of personal data to third countries and/or to International Organisations?¹⁰: N/A

12. General description of security measures¹¹:

Supporting documents used for requesting special cards are kept in electronic version in PAB Unit- HR sector in a shared network. Access is only authorised to the Head of PAB Unit and the staff member of HR sector in charge of dealing with the special cards. Once the EO staff member receives the special cards, the supporting documents and forms are deleted.

13. Information on how data subjects can exercise their rights of access and rectification, and where applicable, of erasure, restriction and data portability¹²:

The data subjects have the right of access to their own personal data and to relevant information concerning how the EO uses them. They have also a right to request rectification of any incomplete or inaccurate data concerning them. They can rectify identification data at any time during the procedure. They have a right to object to the use of their data by the EO on grounds relating to their particular

⁸ Indicate your administrative retention period including its starting point; differentiate between categories of persons or data where needed (e.g. in selection procedures: candidates who made it onto the reserve list vs. those who did not).

⁹ Who will have access to the data within the European Ombudsman? Anyone outside the office? No need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EDPS, Court of Auditors).

¹⁰ If yes, include the identification of the country or International Organisation and the documentation of suitable safeguards (e.g. processor in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty).

¹¹ Where possible. Include a general description of your security measures that you could also provide to the public. See Article 33 on security of processing of Regulation 2018/1725: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

¹² Consider publishing the relevant part of the privacy statement and providing a link. See Articles 15 and 16 on the information to be provided to the data subject(s) and Article 17 to 22 on the rights of data subjects of Regulation 2018/1725: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>



situation, at any time. Under certain conditions, they have the right to ask that the EO deletes their personal data or restricts its use.

At any time, they may ask the EO information concerning its processing of their personal data by e-mail (EO@ombudsman.europa.eu) or by contacting PAB Unit members-HR sector. The EO will reply to their requests as soon as possible and within one month at the latest. They may also contact the EO Data Protection Officer at : dpo-eo-ombudsman@ombudsman.europa.eu If they wish to complain about the Ombudsman's handling of their personal data, they may contact the European Data Protection Supervisor (www.edps.europa.eu) at the following address: EDPS@edps.europa.eu





Privacy Statement

relating to the residence permits of EO staff members (special cards)

This privacy statement explains the reason for the processing, the way the European Ombudsman (EO) collects, handles and ensures protection of all personal data provided, how that information is used and what rights the data subjects may exercise in relation to their data.

The controller is the EO. The joint controllers are (i) the European Parliament (EP)- DG Personnel- Staff Front Office Unit- that deals with the requests for special cards for the staff members assigned in the Brussels Office and (ii) the French and Belgian national authorities which issue the relevant special cards.

1. What personal data will the European Ombudsman process?

We process the following personal data of the EO staff members (officials, temporary and contract agents), and their family members if applicable (spouse and children):

- data on the form used for the request: - *concerning the EO staff member*: name, surname; date and place of birth; nationality; family situation; function and grade; home address; - *concerning the spouse, parents and children of the EO staff member*: name, surname; date and place of birth; nationality;
- supporting documents to the request: copy of the passport or ID card of the EO staff member and family members for which a special card is requested;
- data on the Excel table sent to the French Ministry of Foreign Affairs: data mentioned above concerning the EO staff member; special card number; date of arrival in France; date of exercise of functions; date of end of validity of the special card.

The staff member of PAB Unit-HR sector further processes an Excel table for managing internally the requests for special cards, with the following data: name, surname, number of the card and the date of validity.

2. Why does the European Ombudsman process these personal data?

The purpose is to request special cards from the French or Belgium Ministry of Foreign Affairs for newly recruited staff members and their family members.

3. What are the legal bases and necessity for processing this data?



Processing is necessary on the basis of Article 5(1)(a) (the performance of a task carried out in the public interest) and 5 (1)(b) (compliance with a legal obligation to which the controller is subject) of Regulation 2018/1725.

The legal basis is the Protocol (No 7) on the privileges and immunities of the European Union.

4. Who is responsible for processing the data?

Data is processed by the Unit Personnel, Administration and Budget (PAB)- Sector Human Resources (HR).

5. Who will be recipients of the data?

The EO, the Secretary General, the Head of PAB Unit, the Head of HR sector, the staff member of HR sector in charge of dealing with the special cards, the EP relevant services (DG Personnel- Staff Front Office Unit) and the French and Belgian Ministry of Foreign Affairs.

6. How long will the data be kept?

Supporting documents collected by the EO for requesting the special cards are deleted as soon as they are issued. The data on the Excel table sent to the French Ministry of Foreign Affairs is deleted at the end of each year. The data on the Excel table used for managing internally the requests for staff is kept and updated during all the process. Once a staff member leaves the Office, the relevant data is deleted.

7. How do we protect your data?

Supporting documents used for requesting special cards are kept in electronic version in PAB Unit- HR sector in a shared network. Access is only authorised to the Head of PAB Unit and the staff member of HR sector in charge of dealing with the special cards. Once the EO staff member receives the special cards, the supporting documents and forms are deleted.

Data stored on the EO servers is protected by numerous security measures set up by the ICT sector to protect the integrity and confidentiality of the Institution's electronic property.

8. What are your rights and how can you exercise them?

You have the right of access to your own personal data and to relevant information concerning how the EO uses it.

You have also a right to request rectification of any incomplete or inaccurate data concerning you. You can rectify identification data at any time. You have a right to object to the use of your data by the EO on grounds relating to your



particular situation, at any time. Under certain conditions, you have the right to ask that the EO deletes your personal data or restrict its use.

The EO will reply to your requests as soon as possible and within one month at the latest.

9. Who to contact in case of queries or complaints concerning data protection issues?

At any time, you may send data protection related questions concerning the procedure for requesting special cards to the EO, at the following address:

European Ombudsman
1 avenue du Président Robert Schuman
CS 30403
F-67001 Strasbourg Cedex
EO@ombudsman.europa.eu

You also may contact the Data Protection Officer of the EO office at the following address: DPO-Euro-Ombudsman@ombudsman.europa.eu

You may lodge a complaint with the European Data Protection Supervisor at any time at the following address: EDPS@edps.europa.eu