Processing of personal data in CVs and DoIs of members of the Management Board published on Eurofound’s website

1. Introduction

Personal data contained in Declarations of Interests (DoIs) and CVs provided by members of the Management Board of Eurofound are processed in accordance with Regulation (EU) 2018/1725 of the European Parliament and of the Council 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\(^1\).

The controller is the Head of Resources Unit at Eurofound.

2. Why do we process your personal data?

In light of the principle of transparency and in response to calls by the European Parliament and the European Court of Auditors to reduce the potential for conflicts of interest on the Management Boards of EU Agencies, DoIs accompanied by short CVs of Management Board members are published on Eurofound’s website.

3. What is the legal basis for processing your personal data?

By virtue of Article 4(4) of Regulation (EU) 2019/127 of the European Parliament and of the Council of 16 January 2019 establishing the European Foundation for the improvement of living and working conditions (Eurofound), and repealing Council Regulation (EEC) No 1365/75\(^2\) (hereinafter referred to as ‘Eurofound’s Founding Regulation’), each member and alternate on the Management Board of Eurofound shall sign a written statement at the time of taking office declaring that he or she is not in a situation of conflicts of interest and shall updated his or her initial statement in the case of a change of circumstances with regard to any conflict of interests. Eurofound shall publish the initial statements and their updates on its website.

In line with Eurofound’s Policy on Management of Conflicts of Interests adopted by the Governing Board in July 2014, DoIs and short CVs of members of the Board must be published on Eurofound’s website. The processing of data is therefore based on Article 5(a) and (b) of Regulation (EU) 2018/1725.

4. Which personal data do we collect and process?

The following categories of personal data are processed through the DoI forms:

- Full name
- Position (member of the Management Board, member of an Advisory Committee, other concerned parties participating in Eurofound’s activities)

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Privacy statement

- Information about direct or indirect interests of relevance in the fields of work conducted by Eurofound
  - Direct interest (financial benefits arising from, for example, employment, contracted work, investments, fees, etc.);
  - Indirect financial interests e.g. grants, sponsorships, or other kind of benefits;
  - Interests deriving from the professional activities of the Board member or his/her close family members;
  - Any membership, role of affiliation in organisations/bodies/clubs with an interest in the work of Eurofound;
  - Other interests or facts that the undersigned considers pertinent;
- Signature.

The following categories of personal data are collected through the CV forms:
- Surname(s);
- First name(s);
- Country represented;
- Current professional position;
- Position on the Management Board (Member, Alternate, Chairperson, Deputy Chairperson, Coordinator, Observer);
- Membership of any Management Board committees (i.e. Advisory Committees);
- Starting date of (initial) mandate;
- Starting and ending dates of current mandate;
- Photo.

The member may include additional information such as with regard to previous relevant professional positions.

5. Who has access to your personal data and to whom is it disclosed?
The DoIs and CVs of the members of the Management Board are publicly available on Eurofound’s website.

6. How long do we keep your personal data?
The DoIs and CVs of the Management Board members are published on the website during the entire mandate of the Board member. They are removed once the member resigns. Administrative records relating to the receipt and publication of the DoIs and CVs are retained for 3 years after the end of the mandate of the Management Board.

7. How do we protect and safeguard your data?
The DoIs and CVs are stored directly on Eurofound’s website. The security measures currently in place for Eurofound’s website apply to this processing operation as well.
Administrative records in relation to receipt and publication of the DoIs and CV are stored for the duration of the mandate of the Management Board plus 3 years in Eurofound’s secure document and records management system.

8. Do we transfer any of your personal data to third countries or international organisations (outside the EU/EEA)?
Please see point 5 above.

9. Does this processing involve automated decision-making, including profiling?
No decision is taken by Eurofound in the context of this processing activity solely on the basis of an automated processing of your personal data.

10. What are your rights as a data subject and how can you exercise them?
According to Regulation (EU) 2018/1725, you are entitled to access your personal data and to rectify it in case the data is inaccurate or incomplete. If your personal data is no longer needed Eurofound or if the processing operation is unlawful, you have the right to erase your data.

Under certain circumstances, such as if you contest the accuracy of the processed data or if you are not sure if your data is lawfully processed, you may ask the controller to restrict the data processing. You may also object, on compelling legitimate grounds, to the processing of data relating to you.

Additionally, you have the right to data portability which allows you to obtain the data that the controller holds on you and to transfer it from one controller to another. Where technically feasible, Eurofound will do this work for you.

If you wish to exercise your rights, feel free to contact the Head of Resources of Eurofound by sending an e-mail to management.board@eurofound.europa.eu.

You may always submit queries, remarks or complaints relating to the processing of your personal data to Eurofound’s Data Protection Officer (DPO) by using the following e-mail address: dataprotectionofficer@eurofound.europa.eu.

In case of conflict, complaints can be addressed to the European Data Protection Supervisor (EDPS) using the following e-mail address: edps@edps.europa.eu.