



European Committee
of the Regions

Record of processing activity – Working document

Whistleblowing

PART 1 - Record

1. General Information

Reference number	RE3-1
Last update	30/09/2024
Controller	European Committee of the Regions
Directorate	Directorate E
Unit	E.3 Working conditions and talent management
Contact details	<p>The delegated controller is the reporting officer to whom the whistleblower entrusts the whistleblowing with the obligation to inform OLAF. Where appropriate, the controller may be at the discretion of the whistleblower, his head of unit or director, persons in equivalent positions, or the Secretary-General.</p> <p>As the default contact, Unit E3 Working Conditions is indicated.</p> <p>Contact: Head of the Working Conditions Unit</p>
Joint controller	N/A
Joint controllership arrangement	Available internally
DPO contact details	data.protection@cor.europa.eu
Processor(s)	N/A
Data processing agreement	Available internally

2. Purpose and description of the personal data processing

Purpose(s) of the personal data processing	<p>The purpose of the processing of personal data in the context of a whistleblowing procedure is to enable the staff of the Committee of the Regions who are aware of facts which may give rise to a presumption of possible illegal activity, in particular fraud or corruption, theft or breach of public procurement rules, detrimental to the interests of the Union, or conduct in connection with the performance of functions which may constitute a serious breach of the obligations of officials and other servants of the European Union, can raise the alert by drawing up a report and inform OLAF directly or his/her hierarchy of his/her choice and respond to subsequent requests for information.</p>
Categories of persons whose personal data are processed	<p>The different categories of persons concerned by or involved in the processing of data in the context of the whistleblowing procedure may be as follows:</p> <ul style="list-style-type: none">-all officials of the Committee of the Regions;-all staff (temporary or contractual) of the Committee of the Regions.

	<p>-all members of the Committee of the Regions; -all persons engaged or providing services to the Committee of the Regions (seconded national experts, trainees, temporary staff, local staff, external contractors and subcontractors and their staff)</p>
Categories of personal data processed	<p>The personal data processed in the reporting officer's initial report, as well as in subsequent reports and documents provided in response to or in addition to the initial report, may concern, for information purposes, but not exhaustively:</p> <ul style="list-style-type: none"> -identification data (name, date of birth, address, telephone, grade, etc.); -administrative data (grade, assignment department(s), duties and responsibilities, etc.); -documents produced in the professional context (professional emails, notes, reports, decisions, professional correspondence, etc.); -testimonials. <p>Particularly sensitive data, as defined in Article 10 of Regulation (EU) 2018/1725, are normally not affected.</p> <p>The processing of personal data must be limited to the strict necessary and must be justified with regard to the launching of the alert. Data which are not indispensable are to be erased by the controller. Disclosure of information which cannot be classified as being communicated in good faith, justified and necessary for whistleblowing, but would be abusive and defamatory, is not covered by the whistleblowing procedure and may lead to disciplinary proceedings.</p>
Recipients of the personal data	<p>The data processed in the context of a whistleblowing procedure may be disclosed (in whole or in part and to the extent justified and necessary) to the following persons:</p> <ul style="list-style-type: none"> -The Head of Unit and the Director of the informant or persons in equivalent positions, the Secretary-General and their assistants; -The ethics adviser and the person in charge of ethical and statutory affairs in the human resources departments of the Committee of the Regions; -The services responsible for the processing of data shall: personal Office of the Secretary-General, Legal Service of the Committee of the Regions, Directorate E Administration/Finance and Unit E3 – Working Conditions/Rights/Training as well as EI-HR legal sector; -The Data Protection Officer (DPO); -The person suspected by the whistleblowing and his or her advice; -The informant and the persons involved as witnesses; -Staff responsible for whistleblowing procedures in OLAF.
Transfers of personal data to a third country or an international organization	No
Retention period of the personal data	<p>Personal data processed in the context of the whistleblowing procedure shall be kept confidential until no more than two months after the closure of the procedure by OLAF and subsequently destroyed, unless an administrative inquiry and disciplinary</p>

	<p>procedure conducted by the Committee of the Regions require their retention.</p> <p>Where personal data have been provided, but which cannot be classified as information constituting a whistleblowing procedure (the report cannot be qualified as a whistleblower – see the examples in Article 3(4) and (5) of the Decision – or the data would not be indispensable), such data shall not be subject to detention, unless detention would be justified under Article 11 of the Decision on abuse of procedure.</p>
<p>General description of security measures, where possible</p>	<p>Concerning physical files In view of the particularly sensitive nature, the processing of personal data in the context of a whistleblowing procedure shall be carried out in accordance with the utmost confidentiality, using the means available for this purpose in the institution. Documents in paper format or on an external electronic medium must be stored in locked cabinets. The transmission of data is always done under confidential cover, whether within the institution (e.g.: informant, Ethics Adviser, Head of Unit, Director, Secretary-General and their assistants) or between institutions (e.g.: transmission to OLAF, the General Court or the Court of Justice).</p> <p>Concerning electronic files Electronic documents related to the whistleblowing procedure, usually drawn up by means of word processing, may be stored on external media kept in locked cabinets or on files accessible only to those involved, in particular by protecting a personal password. An e-mail is only possible if confidentiality can be ensured (e.g. if the email is password-secured or if it does not contain content information, but the attached document with the sensitive data is secured by a password).</p>
<p>Data protection notice</p>	<p>Published internally</p>