



European Committee
of the Regions

Record of processing activity – Working document

Interinstitutional Ethics Body

PART 1 - Record

1. General Information

Reference number	RLS-3
Last update	27/03/2026
Controller	European Committee of the Regions
Directorate	Secretary-General
Unit	Legal Affairs
Contact details	LegalServiceCor@cor.europa.eu
Joint controller	N/A
Joint controllership arrangement	N/A
DPO contact details	data.protection@cor.europa.eu
Processor(s)	N/A
Data processing agreement	N/A

2. Purpose and description of the personal data processing

Purpose(s) of the personal data processing	The primary purpose is to ensure full CoR's participation in the EU Ethics Body as Party. Specific processing tasks include: · Managing the participation of CoR representatives and alternate representatives in the Body's work, · Proposing independent experts and facilitating consultations with independent experts regarding the compliance of CoR members' declarations of interest with ethical standards · Identifying and developing common standards regarding external activities, gifts, and hospitality. -Ensuring compliance and handling reports of suspected ethical breaches or harassment, including protecting the identity of reporting persons.
Categories of persons whose personal data are processed	The processing covers several categories of data: · Conduct and Ethics: Declarations of financial/non-financial interests, information on external activities during and after the term of office, and data on gifts, travel, or awards received from third parties.

	· Compliance Data: Information related to suspected breaches of ethical rules · Management of the Body: Professional qualifications and experience of independent experts to ensure an impeccable record of behaviour. · Integrity and Representation: Declarations regarding conflicts of interest for Body members and experts, and demographic data (gender and geographical origin) to ensure balanced representation. · Administrative Data from Members of the Body and independent experts, this may include travel, accommodation, and remuneration details.
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Recipients of the personal data	Recipients include the members of the EU Ethics Body, the five independent experts, and the Secretariat that handles operational and reporting tasks. Participating institutions also receive data when reviewing self-assessments and expert reports. Additionally, oversight bodies like OLAF or the European Ombudsman may receive data if their investigative powers are engaged.
Transfers of personal data to a third country or an international organization	No, your personal data are not transferred to non-EU Member States or to international organisations
Retention period of the personal data	The legal basis for determining how long personal data may be stored derives from Article 4(1)(e) of Regulation (EU) 2018/1725, which sets out the principle of storage limitation. Under this principle, personal data may be retained only for as long as is necessary for the purposes for which it was collected. This requirement is further complemented by Articles 5, 13, and 23 of Regulation (EU) 2018/1725, which oblige EU institutions to ensure that personal data is kept only for the time needed to fulfil their public-interest tasks and to comply with applicable legal obligations.

	These provisions also allow for the retention of certain documents for archiving purposes in the public interest, in line with Union law on historical, statistical, or scientific archiving. Your data are kept for the time necessary to carry out the duties of the EU Ethics Body during the mandate or service of their members and will be retained for 5 years in any case upon their collection. Name, surname and personal contact data are saved in the CoR database for historical and statistical purposes following the period of office', based on Art. 25(4) EUDPR.
General description of security measures, where possible	[General description of security measures, where possible]
Data protection notice	Published internally