European Committee of the Regions

Record of processing activity – Working document

Processing of Personal Data in the Context of Legal Opinions and Litigation Procedures

PART 1 - Record	
1. General Information	
Reference number	RLS-2
Last update	07/07/2025
Controller	European Committee of the Regions
Directorate	Secretary-General
Unit	Legal Affairs
Contact details	The responsible service (delegated controller) is the Legal Service of the CoR (SG.JUR located at Rue Belliard 101). The controller can be contacted through their functional mailbox: legalservicecor@cor.europa.eu.
Joint controller	N/A
Joint controllership arrangement	N/A
DPO contact details	data.protection@cor.europa.eu
Processor(s)	In some duly documented instances, the CoR hires an external Law firm by launching a public contract service to assist it and to represent its interests before the jurisdictions. At those occasions, the hired Law firm acts as a processor of the personal data required to this aim. The contract service includes a chapter with the provisions ruling the data processing.
Data processing agreement	
2. Purpose and description of the personal data processing	
Purpose(s) of the personal data processing	The processing is necessary in order for the Legal Service to fufill its mission, which is twofold: to give legal advice to the Committee, its different bodies, directorates and departments, and to represent the Committee in all court proceedings. In practical terms, the Legal Service needs to process personal data in order to establish facts, as well as rights and obligations of persons concerned and that in order to issue legal opinions and to defend the Committee before the Court of Justice of the European Union and national jurisdictions or delegate the defense to external lawyers that will act as processor. By 'persons concerned', it is to be understood all those persons whose personal data need to be processed by the Legal Service because they are directly concerned or involved in the specific file. It

	includes notably: (a) staff members, including former staff members, family members and job applicants, to whom the Staff Regulations of Officials ('the Staff Regulations') and the Conditions of Employment of Other Servants of the European Union (the 'CEOS') apply; (b) other staff members, including former staff members, to whom the Staff Regulations and the CEOS do not apply (seconded national experts, trainees, traineeship applicants and persons employed under private law contracts); (c) members, alternates, staff of national delegations and advisors of the Committee, , as well as former members, delegates and advisors of the Committee; (d) external persons who ask for access to documents owned by the Committee in the framework of Regulation (EC) 1049/2001 and (d) any person with which the Committee has a legal dispute.
Categories of persons whose personal data are processed	(a) staff members, including former staff members, family members and job applicants, to whom the Staff Regulations of Officials ('the Staff Regulations') and the Conditions of Employment of Other Servants of the European Union (the 'CEOS') apply; (b) other staff members, including former staff members, to whom the Staff Regulations and the CEOS do not apply (seconded national experts, trainees, traineeship applicants and persons employed under private law contracts); (c) members, alternates, staff of national delegations and advisors of the Committee, , as well as former members, delegates and advisors of the Committee; (d) external persons who ask for access to documents owned by the Committee in the framework of Regulation (EC) 1049/2001 and (d) any person with which the Committee has a legal dispute.
Categories of personal data processed	Any personal data that is transmitted to the Legal Service by the relevant internal service and other personal data (communicated by the person concerned or included in the personal file), in particular: (a) data related to identification, such as name, gender, date and place of birth; (b) contact details, such as address, email, phone number; (c) data related to career, such as grade, step, staff number, probationary period reports, appraisal reports, disciplinary proceedings, absences, individual decisions; (d) personal and family situation, such as data related to the spouse and dependants; (e) medical data;

	(f) criminal records; (g) financial data, such as salary, allowances, etc., (h) CV; and (i) emails and other correspondance.
Recipients of the personal data	Personal data are only transmitted on a strictly need to know basis to the staff of the Legal Service dealing with the case of the processing activity. Regarding requests for a legal opinion, the following can be the recipients of the data subjects' personal data: (a) the persons responsible for the file within the Requesting bodies, directorates or departments, their hierarchy (Head of Cabinet/Directors/Heads of Unit) and their secretariat; (b) the Secretary-General and his or her team. (C) the President and his or her team In addition, regarding litigation procedures: (a) parties to the proceedings; (b) the Court of Justice of the European Union; (c) national courts; (d) external lawyers hired by the Committee.
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 personal data of the data subjects' are kept by the Legal Service for a maximum of 8 years from the date the file is closed. This period first covers the period for replying to the request or complaint stemming from actions based on Article 90 of the Staff Regulations (4 months). Data shall be kept for an additional period of time to allow the Legal Service to compare the various disputes with a view to ensuring uniform application of the Staff Regulations in a similar situation. Similarly, in the event of a challenge to the appointing authority's decision by the interested party (appeal before the General Court of the European Union or national courts), the data shall be kept by the Unit for the entire course of the contentious proceedings. In any case, the data of data subjects involved in a legal dispute with the CoR are kept for as long as this legal dispute lasts, including any potential administrative or judicial claim/appeal.
General description of security measures, where possible	Personal data are only transmitted on a strictly need to know basis to the staff of the Legal Service dealing with the case of the processing activity.
Data protection notice	Published internally.