

Authority for European Political Parties and European Political Foundations

Record of processing activity

Article 31 of Regulation (EU) 2018/1725

In accordance with Regulation (EU) 2018/1725, individuals whose personal data are processed by the Authority for European political parties and European political foundations are to be protected with regard to the processing of personal data.

1. CONTROLLER and PROCESS

Data controller details: Authority for European Political Parties and European Political Foundations (“the Authority”)

Person responsible for processing:

Surname: ADAM
Given name: Michael
E-mail: contact@appf.europa.eu
Function: Director
Administrative Address: Trèves 1, 05 V 009
Telephone: +32 2 28 32879
Place of work: Brussels

DPO details: Name: Secondo SABBIONI
Tel. +352 430023595
E-mail: secondo.sabbioni@europarl.europa.eu

Operation/process title: Registering, controlling and imposing sanctions on European political parties and European political foundations (“EU parties and foundations”).

Location: Brussels

1.1 Purpose of processing

The Authority processes personal data in the course of its administrative procedures aimed to register European political parties and European political foundations, supervise their activities and, where appropriate, impose sanctions.

1.2 Legal basis

The relevant legal bases are set out below:

- Regulation (EU, Euratom) No 1141/2014 of the European Parliament and of the Council of 22 October 2014 on the statute and funding of European political parties and European political foundations (“Regulation (EU, Euratom) No 1141/2014”);
- Commission Delegated Regulation (EU, Euratom) 2015/2401 of 2 October 2015 (“Regulation (EU, Euratom) 2015/2401”) on the content and functioning of the Register of European political parties and foundations (“Regulation (EU, Euratom) 2015/2401”);

- Commission Implementing Regulation (EU) 2015/2246 of 3 December 2015 on detailed provisions for the registration number system applicable to the register of European political parties and European political foundations and information provided by standard extracts from the register; and
- Decision of the Authority for European political parties and European political foundations of 17 February 2017 to appoint Mr. Secondo SABBIONI as Data Protection Officer.

1.3 The justification, why do we need this process (Lawfulness of the processing)

Processing operations are mandated by Regulation (EU, Euratom) No 1141/2014.

Indicate if:

1.3.1 The processing meets a functional need of the service, even though there is no legal basis ☐ yes ☐ no

1.3.2 The data subject has given consent to the processing of his personal data for one or more specific purposes ☐ yes ☒ no

1.4 When is the processing expected to be implemented/started for the first time?

Regulation (EU, Euratom) No 1141/2014 applies as of 1 January 2017. However, the Authority started its operations on 1 September 2016.

1.5 When is the processing expected to finish officially?

Processing operations are ongoing.

1.6 Processing of data

1.6.1 Processing automated wholly or in part - is any part of the data processing automated? ☐ yes ☒ no

1.6.2 Non-automated processing of data intended to form part of a filing system. ☒ yes ☐ no

1.7 Storage of data

1.7.1 Indicate the period of storage and its justification:

The Authority retains personal data gathered in the context of the registration of European political parties and foundations for the duration of processing operations and until five years following the year of deregistration of the EU political party or foundation concerned, or following the year in which the legal entity concerned ceases to exist. The information - and personal data - contained in the Authority's register is, however, stored without time limit pursuant to Commission Delegated Regulation (EU, Euratom) 2015/2401.

The Authority retains personal data gathered in the context of the review of financial information for the duration of processing operations and until five years following the year of discharge of the relevant Union budget by the European Parliament.

The Authority may retain personal data for longer time periods in case of legal proceedings or administrative investigations.

Regardless of retention periods, personal data published on the Authority's website are erased from that website at the latest 24 months after publication.

1.7.2 After the process (or operation) has finished, do we keep the data for additional processing: historical, statistical or scientific purposes? ☒ yes ☐ no

1.7.3 If the processing is based on consent, do you store the consent? ☐ yes ☒ no

1.8 File location

1.8.1 ☐ Standalone PC

1.8.2 ☒ Authority network

The Authority's network is currently provided by the European Parliament.

1.8.3 ☐ inter-institutional network (indicate the institution(s) involved)

1.8.4 ☒ internet <http://www.appf.europa.eu/appf/en/transparency.html>

Pursuant to Article 32(1)(a), (e) and (g) and Article 32(3) of Regulation (EU, Euratom) No 1141/2014, the Authority makes public certain documents and information containing personal data through the website identified above.

1.8.5 Is data stored in a “Cloud” solution? ☐ yes ☒ no

1.8.6 Other paper versions (original / signed application documentation) ☒ yes ☐ no

Original documents are stored in locked rooms and cabinets at the Authority’s premises.

2. DATA SUBJECTS AND DATA

2.1 Category (or categories) of data subjects:

The Authority mainly collects and processes personal data regarding the following categories of data subjects:

- Persons vested with administrative, financial and legal representation powers in EU parties and foundations (e.g., presidents, secretaries-general, chairs, external counsels, advisors, etc.).
- Natural persons employed by EU parties and foundations.
- Members of the European Parliament, as well as members of national parliaments and members of regional parliaments or regional assemblies.
- Natural persons who make donations or contributions to EU parties and foundations.

2.2 Indicate the measures that will be taken to inform the data subject of the identity of the data controller

The Authority publishes on its website data protection statements and notices to inform all data subjects of its activities involving processing of personal data.

In addition, pursuant to Article 32(4) of Regulation (EU, Euratom) No 1141/2014, EU parties and foundations must, in a publicly available privacy statement, inform potential members and donors that their personal data will be processed for auditing and control purposes by, among others, the Authority, and that their personal data will be made public on the Authority’s website.

2.3 Please, explain how data subjects may exercise their rights, including relevant contact e-mail address (e.g., right of access, rectification, erasure and to object)

- **Data subject rights:** data subject can exercise their rights under Regulation (EU) 2018/1725 by sending an email to contact@appf.europa.eu.

2.4 Please, list the personal data processed

The categories of personal data processed by the Authority include:

- Personal data relating to persons vested with administrative, financial and legal representation powers in EU parties and foundations:
 - Surname, name, nationality, date of birth, domicile, function, political affinity
- Personal data regarding natural persons employed by EU parties and foundations:
 - Surname, name, nationality, function, political affinity
- Personal data relating to Members of the European Parliament, as well as members of national parliaments and members of regional parliaments or regional assemblies:
 - Surname, name, nationality, date of birth, domicile, function, political affinity

- Personal data relating to natural persons who make donations or contributions to EU parties and foundations:
 - Surname, name, nationality, financial data and potentially political affinity
- Personal data in the context of sanctions:
 - The personal data processed depend on the type of infringement pursued by the Authority under Article 27 and Article 27a of Regulation (EU, Euratom) No 1141/2014.

The Authority may also process other categories of personal data (*e.g.*, national identification numbers), taking into account the concrete circumstances of a specific case and the need to carry out particular checks and verifications.

2.5 Collection of data

2.5.1 Collection from the data subject (direct) ☐ yes **X** no

2.5.2 Other source of collection (indirect) - please specify: **X** yes ☒ no

Personal data are mainly provided to the Authority by European political parties and foundations.

3. TRANSFER

As noted above, pursuant to Article 32(1)(a), (e) and (g) and Article 32(3) of Regulation (EU, Euratom) No 1141/2014, the Authority makes public certain documents and information containing personal data through the Authority's website.

3.1 Will the data be transferred to other services within other EU institutions/bodies?

Under Article 28 of Regulation (EU, Euratom) No 1141/2014, the Authority is called upon to cooperate and share information with the competent services of the European Parliament, in particular the Authorising Officer of the European Parliament and the Directorate-General for Finance, as well as other EU institutions and bodies such as the Court of Auditors and the European Anti-Fraud Office (OLAF).

3.1.1 Have the data been transferred following a request from the recipient? **X** yes ☐ no

3.1.2 Has the data controller verified the competence of the recipient and made a provisional evaluation of the need for the transfer of the data? **X** yes ☐ no

3.1.3 Has the recipient been informed of his obligations in respect of this transfer? **X** yes ☐ no

3.2 In case of transfer to recipients other than the EU institutions and bodies, but in the EU and subject to Regulation 679/2016 (*e.g.* national administrations, private sector):

Under Article 28 of Regulation (EU, Euratom) 1141/2014, the Authority is called upon to cooperate and could potentially share information with the competent services of the Members States, in particular the National Contact Points designated pursuant to that Regulation.

3.2.1 Has the recipient established that the data are necessary? **X** yes ☐ no

3.2.2 Has the recipient established the need for their transfer? **X** yes ☐ no

3.3 In case of transfer to recipients outside the EU, please specify the legal basis, the nature of the data transmitted and indicate who the recipients are:

N/A

3.3.1 Has the person responsible for the transfer established that an adequate level of protection is ensured in the country of the recipient (both during the transfer and in storage)? ☐ yes ☐ no

3.3.2 Please, add any additional information for this transfer (*e.g.*, any agreements or documentation indicating type of security that is/are in place).

4. SECURITY OF PROCESSING (NOT PUBLIC)

- 4.1** Physical security (access to computer systems, quality of the file supports, public access or restricted access to locations, storage, transport of equipment, etc.):

Access to the Authority's premises is subject to access card-enabled doors and security controls upon entrance and IT equipment is stored in locked rooms and physical documentation in locked cupboards.

- 4.2** IT system(s) security (coding control, undue removal or transmission of data, passwords, encrypted directories, backup, audit trails for data processing and communication, etc.):

IT equipment can only be accessed via unique login details and alphanumeric passwords allocated to the Authority's staff.

- 4.3** Staff security (individual access, control mechanism, etc.)

Staff has access to personal data on a need-to-know basis.

- 4.4** Is there an agreed notification procedure for the controller, after becoming aware of a personal data breach?
X yes ☐ no

- 4.5** Is there an agreed notification procedure between the processor and the controller, after becoming aware of a personal data breach?
☐ yes ☐ no

Comments on security:

5. ANALYSIS OF RISK

5.1 Does the process have

- 5.1.1** Automated processing activity (including profiling), on which decisions are based? ☐ yes **X** no

- 5.1.2** Large scale processing of special categories of data ☐ yes **X** no

- 5.1.3** Monitoring of a public accessible area ☐ yes **X** no

5.2 Data Protection Impact Assessment Status

- Has the need for a DPIA been identified? ☐ yes **X** no

- Has a DPIA been done? ☐ yes **X** no

- Has the DPO been involved? **X** yes ☐ no

If a "Prior Check" or Opinion was done by the EDPS, please describe and give "Case Number" if known:

The EDPS provided an Opinion on Regulation (EU, Euratom) No 1141/2014 in the context of the legislative procedure, see executive summary OJ C 253, 3.9.2013, p. 12 (the full text of this Opinion can be found in English, French and German on the EDPS website <http://www.edps.europa.eu>).

Comments on analysis of risk:

6. FURTHER INFO

Give any information you consider relevant and indicate the heading it refers to:

Comments on further info:

The data controller declares the accuracy of the above statements and undertakes to notify any change affecting this information to the Data Protection Officer of the Authority for European political parties and European political foundations.

Date: 10 November 2020

Signature of data controller

Michael ADAM *[signed]*
Director