

# Annual Report

**2008**

## Executive Summary



THE EUROPEAN DATA  
PROTECTION SUPERVISOR





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PROTECTION SUPERVISOR

Postal address: rue Wiertz, 60 — B-1047 Brussels  
Office: rue Montoyer, 63, Brussels, Belgium  
E-mail: [edps@edps.europa.eu](mailto:edps@edps.europa.eu)  
Website: [www.edps.europa.eu](http://www.edps.europa.eu)  
Tel. (32-2) 283 19 00  
Fax (32-2) 283 19 50

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Luxembourg: Office for Official Publications of the European Communities, 2009

ISBN 978-92-95030-84-8

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# Introduction

This is the Executive Summary of the Annual Report 2008 of the European Data Protection Supervisor (EDPS). This Report covers 2008 as the fourth full year of activity of the EDPS as a new independent supervisory authority. This report also concludes the first EDPS mandate and provides an opportunity to take stock of developments since the start.

Peter Hustinx (Supervisor) and Joaquín Bayo Delgado (Assistant Supervisor) took office in January 2004 to set up the authority which deals with the protection of personal data at the level of the European Union (EU). The mission of the EDPS is to ensure that the fundamental rights and freedoms of natural persons, and in particular their privacy, with regard to the processing of personal data are respected by the Community institutions and bodies.

As laid down in Regulation (EC) No 45/2001<sup>1</sup>, the EDPS' main activities are to:

- monitor and ensure that the provisions of the Regulation are complied with when Community institutions and bodies process personal data (supervision);
- advise the Community institutions and bodies on all matters relating to the processing of personal data. This includes consultation on proposals for legislation and monitoring new developments that have an impact on the protection of personal data (consultation);
- cooperate with national supervisory authorities and supervisory bodies in the “third pillar” of the EU with a view to improving consistency in the protection of personal data (cooperation).

This report shows that great progress was achieved both in supervision and in consultation. Compliance with data protection rules and principles in Community institutions and bodies is developing, but there are still great challenges ahead. The emphasis of supervision is therefore shifting to monitoring the implementation of recommendations in prior checking and to improving the level of compliance in agencies. In this context, the EDPS has also completed a first series of on the spot inspections in different institutions and bodies to measure compliance in practice.

The EDPS further improved his performance in consultation in 2008 and submitted opinions on an increasing number of proposals for legislation. He widened the scope of his interventions to a greater variety of policy areas, and to all stages of the legislative procedure. The majority of the EDPS opinions continued to concern issues related to the area of freedom, security and justice, but other policy areas, such as e-privacy, public access to documents and cross-border healthcare, were also quite prominent.

Cooperation with national supervisory authorities continued to focus on the role of the Article 29 Data Protection Working Party, which resulted in the adoption of a new work programme and several good results in its first year of operation. The EDPS also continued to put emphasis on the coordinated supervision of Eurodac and to cooperate closely with data protection authorities in the area of police and judicial cooperation.

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<sup>1</sup> Regulation (EC) No. 45/2001 of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data, OJ L 8, 12.01.2001.

## Results in 2008

The Annual Report 2007 mentioned that the following main objectives had been selected for 2008. Most of these objectives have been fully or partially realised.

- **Support of data protection officers' network**

The EDPS continued to give strong support to data protection officers and encouraged a further exchange of expertise and best practices among them. Particular attention was given to data protection officers of recently established agencies.

- **Role of prior checking**

A record number of prior checking opinions were issued, with still some work ahead to finish prior checking of existing processing operations for most institutions and bodies. More emphasis was put on the implementation of recommendations.

- **Horizontal guidance**

Guidance on relevant issues common to most institutions and bodies (e.g. recruitment of staff, processing of health related data) was developed, at first to facilitate prior checking for agencies. This guidance will soon be made available for all interested parties.

- **Measuring compliance**

The EDPS continued to measure compliance with Regulation (EC) No 45/2001 by all institutions and bodies, and will report on progress made by mid 2009. In addition to this general survey, a first series of inspections was held in different institutions and bodies to verify compliance on specific issues.

- **Large scale systems**

The EDPS has continued to develop a coordinated supervision of Eurodac together with national supervisory authorities, and to implement the work programme adopted for this purpose. The EDPS has also made first steps with regard to other large scale systems, such as SIS II and VIS.

- **Opinions on legislation**

The EDPS issued a record number of opinions or comments on proposals for new legislation or related documents, covering a wider area than ever before, and ensured adequate input from the first until the last phase of the legislative procedure.

- **Treaty of Lisbon**

The impact of the Lisbon Treaty has been closely analyzed, but its entry into force depends on final ratifications by a few Member States. The analysis highlighted that the Treaty has a great potential impact, both for institutional and substantive reasons, with clear opportunities for improvement of data protection.

- **On line information**

The information available on the EDPS website has been improved, both by updating and developing its content, and by enhancing its accessibility. Further improvements are expected in the course of 2009, and will also include the electronic newsletter.

- **Rules of procedure**

The preparation of rules of procedure, covering the different roles and activities of the EDPS, has made good progress, together with the development of internal case manuals for the most important activities. The results will be available on the EDPS website in the course of 2009 with practical tools for interested parties.

- **Resource management**

The management of financial and human resources was consolidated or further developed and other internal processes were enhanced. The functionality and efficiency of internal control functions were also improved.

## Objectives for 2009

This will be the first year of a new EDPS mandate, with a partly new composition of the institution. A mixture of continuity and change is therefore to be expected. This year will be used for a strategic assessment of the roles and tasks of the EDPS and to set out main lines of development for the next four years. This reflection will coincide with significant changes in the EDPS external environment, such as the challenges coming from a new European legislature, a new European Commission, a possible entry into force of the Lisbon Treaty, other new long term policies and frameworks and their combined impact on data protection. The EDPS intends to take a clear position in this context and will report on conclusions in the next Annual Report.

The following main objectives have been selected for 2009, without prejudicing the outcome of this strategic reflection. The results achieved will also be reported next year.

- **Support of data protection officers' network**

The EDPS will continue to give strong support to data protection officers, particularly in recently established agencies, and encourage an exchange of expertise and best practices among them, in order to strengthen their effectiveness.

- **Role of prior checking**

The EDPS intends to complete prior checking of existing processing operations for most institutions and bodies, and put increasing emphasis on the implementation of recommendations. Prior checking of processing operations common to most agencies will receive special attention.

- **Horizontal guidance**

The EDPS will continue to develop guidance on relevant issues common to most institutions and bodies, and make it generally available. Guidelines will be published on video-surveillance that will also help to focus attention to situations giving rise to specific risks.

- **Complaint handling**

The EDPS will publish a policy framework for the handling of complaints to inform all parties involved about relevant procedures, including criteria on whether or not to open an investigation on complaints presented to him.

- **Inspection policy**

The EDPS will continue to measure compliance with Regulation (EC) No 45/2001, with different kinds of checks for all institutions and bodies, and increasingly execute inspections on the spot. A general inspection policy will be published on the EDPS website in 2009.



- **Scope of consultation**

The EDPS will continue to issue timely opinions or comments on proposals for new legislation, on the basis of a systematic inventory of relevant subjects and priorities, and ensure adequate follow up.

- **Stockholm program**

The EDPS intends to give special attention to the preparation of a new five-year policy programme for the area of freedom, security and justice, for adoption by the European Council at the end of 2009. The need for effective safeguards for data protection will be emphasized as a key condition.

- **Information activities**

The EDPS will further improve the quality and effectiveness of the online information tools (website and electronic newsletter) and will assess and where necessary update other information activities.

- **Rules of procedure**

The EDPS will adopt and publish rules of procedure, confirming or clarifying present practices as to his different roles and activities. Practical tools for interested parties will be made available on the website.

- **Resource management**

The EDPS will consolidate and further develop activities relating to financial and human resources, and enhance other internal work processes. Special attention will be given to the long term recruitment of staff, the need for additional office space, and the development of a case management system.

## Supervision

One of the main roles of the EDPS is to supervise in an independent manner processing operations carried out by Community institutions or bodies. The legal framework is Regulation (EC) No 45/2001, which establishes a number of obligations for those who process data, along with a number of rights for those whose personal data are processed.

Processing operations of personal data that do not present special risks for the data subjects are notified only to the data protection officer of the institution or body concerned. When personal data processing presents special risks for those whose data are processed, it needs to be prior checked by the EDPS. The EDPS then determines whether or not the processing complies with the Regulation.

The supervisory tasks, overseen by the Assistant Supervisor, range from providing advice and assisting data protection officers, through prior checking risky processing operations, to conducting inquiries, including on the spot inspections, and handling complaints.

### Prior checks

In 2008, prior checking continued to be the main aspect of the EDPS in his supervisory role.

As mentioned in previous annual reports, the EDPS has constantly encouraged data protection officers to increase the number of prior checking notifications to the EDPS. The deadline of spring 2007 for receipt of notifications to be prior checked by the EDPS – *ex post* cases – was fixed to trigger Community institutions and bodies to increase their efforts towards a complete fulfilment of their notification obligation. The effect was a significant increase of notifications.

Overall, 2008 was an intensive year of work, with more **prior check opinions** (105 opinions) issued than in any of the preceding years. Only a limited number of those cases (18 cases) were “proper” prior checking cases, i.e. the institutions concerned followed the procedure involved for prior checking before implementing the processing operation.

For the first time, the EDPS decided to suggest the withdrawal of some notifications. This was due to the fact that those notifications either concerned old processing operations about to be substituted by new ones or notifications that lacked sufficient information rendering it impossible to treat them with a correct understanding of the facts or the procedure.

As regards timelines, the number of days needed by the EDPS to draft opinions represents a decrease of more than two days of work compared to 2007. It is a very satisfactory figure considering the increase of numbers and complexity of the notifications. The EDPS is however

concerned about the lengthy periods needed by the institutions and bodies to complete information. In this context, he once again reminds them of their obligation to cooperate with the EDPS and to provide him with the requested information.

In 2008, the *ex-post* prior checks cases<sup>2</sup> mainly covered the following issues: health related data processed by institutions and bodies, recruitment of staff and selection of candidates, staff evaluation, journalist accreditation, identity management systems, access control and security investigations.

As regards main issues in proper prior-checks, these concerned specific selection procedures, notably at the Fundamental Rights Agency and for the EDPS, a pilot project concerning individual monitoring, flexitime, identity and access control, as well as e-monitoring.

Some meaningful issues have also been addressed for the first time, including identity management service, access control with iris scanning or fingerprint authentication, security investigations, monitoring of the use of the Internet by staff, and CCTV system.

## Complaints

The total number of complaints continued to increase in 2008 (91 complaints received), with less admissible complaints than before (23 admissible complaints), but more complexity on the whole. A large majority of complaints were declared inadmissible in particular because they exclusively concerned processing of personal data on the level of the Member States (where national data protection authorities are competent). Admissible cases related in particular to issues such as access to data, processing of sensitive data, right of rectification and obligation to provide information.

The EDPS has continued working on a policy framework for the handling of complaints. The main elements of the procedure and a model form for the submission of complaints, together with information on the admissibility of complaints, will be made available on the EDPS website in 2009. This publication is expected to help potential complainants submit a complaint, whilst limiting the number of clearly inadmissible complaints.

## Inspection policy

In the framework of the “Spring 2007 deadline”, the first part of the operation launched in 2007 took the form of letters addressed to directors of institutions and agencies in order to measure the level of compliance with the Regulation. On the basis of the feedback received, the EDPS drafted a general report, which was made public in May 2008 and was sent to all institutions and agencies. As announced, the operation was the start of an ongoing exercise by the EDPS to ensure compliance with the Regulation, leading to possible on-the-spot inspections.

In this context, the EDPS has further developed his **inspection policy** and has completed a first series of on the site inspections in different institutions and bodies to measure compliance

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<sup>2</sup> “Ex post” prior checks relate to processing operations that started before the appointment of the EDPS and the Assistant Supervisor (17 January 2004), and that therefore could not be checked prior to their start.

in practice. Inspections can be triggered by a complaint or can be carried out at the EDPS' own initiative. During inspections, the EDPS verifies facts and reality on the spot. Inspections can also largely contribute to raise awareness for data protection matters in the inspected institutions.

In 2008, the EDPS defined the first comprehensive procedure for his inspection activities. It consisted in a three-phase process:

- in the first phase, two rehearsal visits were carried out to test the EDPS methodology on site;
- in the second phase, the EDPS refined its practical methodology;
- in the third phase, two inspections were carried out in European institutions and bodies – the European Economic and Social Committee and the European Food Safety Authority – which were selected in the framework of the spring 2007 exercise.

## Administrative measures

The EDPS also continued to provide advice on administrative measures envisaged by Community institutions and bodies in relation to the processing of personal data. A variety of challenging issues was raised, including a new model of medical certificate; access to public documents containing personal data; applicable law to certain processing activities; transfer to a national tribunal of a medical file; implementing rules of Regulation (EC) No 45/2001 and complaints handled by the European Ombudsman.

## Video-surveillance

The EDPS continued to work on his video-surveillance **guidelines** to provide practical guidance to EU institutions and bodies on compliance with data protection rules when using video-surveillance systems. The first internal working draft of the guidelines was prepared by the end of 2008. The draft will be made public for consultation by mid-2009.

# Consultation

The EDPS advises the Community institutions and bodies on data protection issues in a range of policy areas. This consultative role relates to proposals for new legislation as well as other initiatives that may affect personal data protection in the EU. It usually takes the shape of a formal opinion, but the EDPS may also provide guidance in the form of comments or policy papers. Technological developments having an impact on data protection are also monitored as part of this activity.

## EDPS opinions and key issues

The EDPS issued **14 opinions** on proposed EU legislation in 2008. As in previous years, a substantial part of the opinions relate to the area of **freedom, security and justice**, both in the Community “pillar” and in the field of police and judicial cooperation in criminal matters (“third pillar”). This area represents almost half of the legislative opinions issued, namely six out of 14. An important development in this area was the adoption of the **Data Protection Framework Decision** of 27 November 2008 on the protection of personal data processed in the framework of police and judicial cooperation in criminal matters. Throughout the negotiations, this piece of legislation has been a major focus of attention for the EDPS who issued three opinions as well as comments on the subject.

The proposal to modify the Regulation on **public access to documents** held by EU institutions as well as the review of the Directive on privacy and electronic communications (**ePrivacy Directive**) were also of special attention to the EDPS. **Passenger Name Records** (PNR) related matters were quite prominent as well in the EDPS consultative activities, in particular with regard to the follow up of the EU PNR proposal.

### Exchange of information

The issue of exchange of information, in particular the establishment of information systems and access to those systems, was a key focus area. The EDPS adopted opinions on information exchange systems that were proposed in the framework of the Internal Market Information System (IMI), Eurojust, road safety, the protection of children using the Internet, ECRIS, the EU-US High Level Contact Group on information sharing, and the European e-Justice strategy. Preliminary comments were also issued on the Commission’s EU border management package.

The EDPS opinions emphasised the need for such exchange of information to be properly and carefully assessed in each case. Moreover, when such exchange of information is established, specific data protection safeguards need to be implemented.

### New technologies

On several occasions, the EDPS addressed the issue of the use of new technologies (e.g. ECRIS, European e-Justice strategy). He repeatedly called for ensuring that data protection considerations

are taken into account at the earliest possible stage (“**privacy-by-design**”). He also highlighted that technology tools should be used not only to ensure the exchange of information, but also to enhance the rights of the persons concerned.

The developments taking place in the **Information Society** have again been closely followed and commented upon, such as **RFID** and ambient intelligence, as a follow up to the European Commission’s Communication on RFID and the related EDPS opinion.

The EDPS also clarified his possible contributions to the **EU research and technological development** (RTD) and consolidated actions already initiated. A **policy paper** was adopted to describe the possible role the institution could play for research and developments projects in the seventh framework programme for RTD.

### Quality of data

Quality of data was another important theme. A high level of accuracy of data is indeed needed to avoid ambiguity concerning the content of information processed. It is therefore imperative that the accuracy be regularly and properly checked. Moreover, a high level of data quality represents not only a basic guarantee for the data subject, but also facilitates the efficient use for those who process the data.

## New developments and priorities

A number of perspectives for future changes, which will serve as the agenda of main priorities for the EDPS, have been identified. They include new **technological trends** raising critical data protection and privacy concerns, such as the development of cloud computing systems<sup>3</sup> and light-speed DNA-sequencing technology.

As regards new developments in **policy and legislation**, the main issues to which the EDPS intends to devote special attention include the following:

- reflection on further improvements of the **Data Protection Framework Decision** to increase the level of protection provided by the new instrument in the third pillar;
- the future of the **Data Protection Directive**;
- the European Commission’s multi-annual program in the area of freedom, security and justice - referred to as “**Stockholm Program**”;
- major trends in **law enforcement** and legislative activities relating to the fight against terrorism and organised crime;
- the revision of the Regulation on **public access to documents**;
- new initiatives aimed at enhancing **cross-border healthcare** in combination with the use of information technologies.

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<sup>3</sup> Cloud computing refers to the use of Internet (“cloud”) based computer technology for a variety of services. It is a style of computing in which dynamically scalable and often virtualized resources are provided as a service over the Internet.

## Cooperation

The EDPS cooperates with other data protection authorities in order to promote consistent data protection throughout Europe. This cooperative role also extends to cooperation with supervisory bodies established under the EU third pillar and in the context of large scale IT systems.

The main platform for cooperation between data protection authorities in Europe is the **Article 29 Working Party**, which provides the European Commission with independent advice on data protection matters. The EDPS participates in the activities of the Working Party, which plays a crucial role in the uniform application of the Data Protection Directive.

The EDPS and the Working Party have cooperated in good synergy on a range of subjects, but especially focussing on the implementation of the Data Protection Directive and on data protection challenges raised by new technologies. The EDPS also strongly supported initiatives taken to facilitate international data flows (e.g. Binding Corporate Rules).

In 2008, the Working Party adopted opinions on proposals for legislation, which in some cases had also been subject to EDPS opinions (e.g. review of ePrivacy Directive). While consultation of the EDPS is a compulsory feature of the EU legislative process, contributions of the Working Party are also very useful, particularly since they may contain special points of attention from a national perspective. The EDPS therefore welcomes these contributions which have been consistent with his own opinions.

One of the most important cooperative tasks of the EDPS relates to the coordinated supervision of **Eurodac**, where the responsibilities for data protection supervision are shared between the national data protection authorities and the EDPS. The Eurodac Supervision Coordination Group – composed of national data protection authorities and the EDPS – met twice in 2008 and focused on the implementation of the work programme adopted by the Group in December 2007. Three topics had been selected within the work program for closer examination and reporting, namely: information of the data subjects, children and Eurodac, and DubliNet<sup>4</sup>. At the same time, the framework in which the Group is operating has also attracted attention: the European Commission has undertaken the review of the Dublin and Eurodac Regulations, in the framework of the asylum measures in general.

The need for close cooperation between the EDPS and other data protection authorities in **third pillar matters** – area of police and judicial cooperation - has become more apparent in recent years through the increase of initiatives at European and international levels aimed at collecting and sharing personal data. The EDPS strives to ensure a high and consistent level of data protection in the fields of the supervisory data protection bodies (Joint Supervisory Bodies for Schengen, Europol, Eurojust and the Customs Information System) established under the

<sup>4</sup> DubliNet is the secure electronic network of transmission channels between the national authorities dealing with asylum applications. Usually, a “hit” in the Eurodac system will trigger an exchange of data about the asylum seeker. This exchange will use DubliNet.

EU third pillar. In 2008, the EDPS actively contributed to the meetings held by the Working Party on Police and Justice that addressed sensitive issues, such as the implementation of the Prüm Treaty, the Framework Decision of Data Protection in the third pillar and PNR.

Cooperation in other **international fora** continued to attract attention. As in previous years, the EDPS took part in the European and International Conferences of Data Protection and Privacy Commissioners, which gave participants the opportunity to discuss topical challenges for data protection, such as developments related to security and new technologies and the issue of privacy in a borderless world. Appropriate follow-up was also given to the “London initiative” on raising awareness of data protection and making it more effective. Finally, following similar events organised in 2005 and 2007, a third workshop on data protection in international organisations is under consideration.



## Communication

Information and communication play a pivotal role in ensuring visibility of the EDPS' main activities and in raising awareness both of the EDPS' work and of data protection in general. This is all the more strategic since the EDPS is still a relatively new institution and awareness of its role at EU level therefore needs to be further consolidated.

Four years after the start of work, we can see that the emphasis placed on communication generated payoff in terms of **visibility**. Meaningful indicators of achievements include a higher volume of requests for information, increased traffic on the website, a constant rise in the number of subscribers to the newsletter, regular requests for study visits at the EDPS and invitations to speak at conferences. In addition, more systematic contact with the media and, as a result, substantial rise in media coverage of EDPS activities further emphasize the view that the EDPS has become a point of reference for data protection issues.

**Media relations** continued to be a key focus of communication activities, with the EDPS giving about twenty-five **interviews** to journalists from the print, broadcast and electronic media in 2008. The press service issued 13 **press releases**, most of which related to new legislative opinions having a high public general relevance. They covered issues such as the review of the ePrivacy Directive, adoption of the Framework Decision on Data Protection in the third pillar, public access to EU documents, and transatlantic information sharing for enforcement purposes. A press conference was also organised in May 2008 to present the main conclusions of the Annual Report 2007 to the press.

In addition to media enquiries received on a regular basis, the press service dealt with about 180 public **requests for information** coming from a wide range of individuals and stakeholders. The EDPS welcomed visits from **student groups** specialised in European law, data protection and/or IT security issues to also reach out to the academic world.

With a view to giving further visibility to his ongoing activities, the EDPS continued to make use of the following other information tools:

- **website:** technical upgrades and content improvements, including the development of a “Glossary of terms” on the protection of personal data and a “Questions and Answers” section, were brought to the website. Statistical data show that, from 1 February to 31 December 2008, the website received a total of 81 841 visitors, with a peak of 10 095 visitors in May at the time of the publication of the Annual Report 2007;
- **electronic newsletter:** five issues of the EDPS newsletter were published in 2008. The number of subscribers rose significantly between 2007 and 2008. Preparatory work was undertaken to provide an upgraded newsletter with the aim of providing a more reader-friendly information tool;
- **promotional events:** the EDPS renewed his participation at the Data Protection Day and the EU Open Day; holding information stands in the main EU institutions;
- **information brochure:** the development of an updated information brochure was initiated, notably in view of the first EDPS mandate coming to an end in January 2009.

## Administration, budget and staff

With the aim of further consolidating its positive start and, consequently, handling new tasks assigned, **additional resources** both in terms of budget (increasing from EUR 4 955 726 in 2007 to EUR 5 307 753 in 2008) and staff (from 29 to 33) have been attributed to the EDPS.

As regards the **budget**, a new budget terminology was applied in 2008 so as to ensure the transparency required by the budgetary authority. In its report on the 2007 financial year, the European Court of Auditors stated that the audit had not given rise to any observations.

In terms of **human resources**, the growing visibility of the institution is leading to an increased workload, together with an expansion of tasks. The EDPS has however chosen to use controlled growth to ensure that new staff members are fully taken on board. The EDPS therefore called for the creation of only four posts in 2008. The traineeship programme continued to host about two trainees per session. In addition, two seconded national experts from national data protection authorities were recruited.

As regards the EDPS's **organisation chart**, the increasing workload has prompted the creation of a new function as coordinator. To this end, five coordinators have been designated in the consultation and supervision teams.

With regards to **internal control**, the evaluation performed by the EDPS services and the Internal Auditor have demonstrated the functionality and efficiency of the internal control system and its ability to provide reasonable assurance for the achievement of the institution's objectives.

The EDPS has appointed his own **Data Protection Officer** to ensure the internal application of the provisions of Regulation (EC) No 45/2001. The process to identify processing operations containing personal data and to determine which operations are subject to prior checking continued in 2008. An inventory of internal operations has been finalised. On this basis, the first notification process has been launched.

New **internal rules** necessary for the proper functioning of the institution were adopted, including decisions on certification, on security measures and on the appointment of a local security officer for EDPS.

The implementation of a new **document management** system (GEDA) has been followed through. This implementation is seen as a first step in the development of a case flow management system for improved support to EDPS activities.

The European guardian of personal data protection

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Luxembourg: Office for Official Publications of the European Communities

2008 — 16 pp. — 21 x 29.7 cm

ISBN 978-92-95030-84-8

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