

EDPS Record of Processing Activity

| Nr. | Item | Description |
|-----|---------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <i>Management of Data Subject Requests</i> | |
| 1. | Last update of this record | 12/01/2026 |
| 2. | Reference number | 93 |
| 3. | Name and contact details of controller | <p>European Data Protection Supervisor (EDPS) Postal address: Rue Wiertz 60, B-1047 Brussels Office address: Rue Montoyer 30, B-1000 Brussels Telephone: +32 2 283 19 00 Email: edps@edps.europa.eu</p> <p>Delegated controller: Secretary-General</p> <p>Contact form for enquiries on processing of personal data to be preferably used: https://www.edps.europa.eu/about-edps/contact_en</p> |
| 4. | Name and contact details of DPO | dpo@edps.europa.eu |
| 5. | Name and contact details of joint controller | n/a |

Document info

Roles & Contact Details

| Nr. | Item | Description |
|-----|---------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6. | Name and contact details of processor | If reply is sent by post (mail), a processor providing postal services would be involved. In that case, only the name and postal address of the recipient would be processed by the processor. |
| 7. | Short description and purpose of the processing | <p>After receiving requests from data subjects, exercising data protection rights provided for in the Regulation (EU) 2018/1725. ('the Regulation') the EDPS, as controller, processes certain personal data in order to manage them (i.e. ensure appropriate follow-up).</p> <p>Data subjects are informed on how to exercise their rights in a specific section of the EDPS website - 'How to exercise your data protection rights at the EDPS'.</p> |
| 8. | Description of categories of persons whose personal data is processed and list of data categories | <p><u>Categories of persons whose personal data is processed</u></p> <ul style="list-style-type: none"> - Any person who submits a request to the EDPS under Chapter III of the Regulation - EDPS staff involved in the management of the requests <p><u>Categories of personal data</u></p> <p>The following categories of personal data may be processed for the purposes of replying to the request:</p> <ul style="list-style-type: none"> - Personal data provided by the data subject in the context of the request. This can include: name; e-mail address; phone number; postal address; the request itself and any personal data provided together with the request (e.g. personal data included in annexes). - Where applicable, any personal data of the data subject that the controller processes for specific purposes: e.g. human resources purposes, complaint handling. |

Description of processing

| Nr. | Item | Description | Description of processing |
|-----|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| | | <p>- Where applicable (i.e. where reasonable doubts regarding the data subject's identity arise), additional personal data requested by the controller in order to authenticate the data subject: e.g. copy of the ID card or passport containing full name, the issuing authority and the expiry date. Other elements (photo, serial-number, nationality and personal characteristics) can be redacted before being sent to the EDPS (data subjects are informed about it in the request and on the EDPS website).</p> | |
| 9. | Time limit for keeping the data | <p>Personal data processed as a result of the request ('personal data') is kept as follows:</p> <ul style="list-style-type: none"> - In case where personal data of the requester is identified (such as for example as a result of an access to personal data request), personal data is stored in electronic files for up to five (5) years after case closure, after which it is deleted. - If no personal data of the requester is identified, personal data is stored in electronic files until the end of the current reporting period (as a rule until mid-next year), after which it is deleted. - If data subjects are asked to provide additional information (i.e. clarifying the scope of the request) and/or evidence (i.e. copy of a document authenticating the identity or power of attorney) but do not provide it, personal data is stored in electronic files for up to two (2) years after case closure, after which it is deleted. - In case of requests outside the EDPS's competence (inadmissible requests), personal data is stored for one (1) year after case closure, after which it is deleted. - Personal identification documents provided by the data subject at the request of the EDPS in order to authenticate the identity of the data subject (where the controller has reasonable doubts concerning the identity of the natural person | Retention |

| Nr. | Item | Description |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | <p>making the request) are kept only as long as necessary to verify the data subject's identity and are deleted afterwards.</p> <p>Retention periods may be extended if required by legal proceedings.</p> |
| 10. | Recipients of the data | <ul style="list-style-type: none"> - The European Parliament in its role as service provider for the EDPS - Where applicable, the European Commission in its role as service provider for the EDPS - Other EU institutions, bodies and agencies or third parties only where necessary to ensure the appropriate investigation or follow-up of the request - Bodies charged with a monitoring or inspection task under EU law, where required for official investigations or for audit purposes; - The Court of Justice of the European Union, where relevant - In case of reply by post, certain personal data (only the name and postal address of the recipient) will be provided to the processor in order to deliver the mail. |
| 11. | Are there any transfers of personal data to third countries or to international organisations? If so, to which ones and with which safeguards? | As a rule, no, except when reply is being sent outside of the EEA. |

Recipients

Transfers



| Nr. | Item | Description |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12. | General description of security measures, where possible. | <ul style="list-style-type: none"> - Data subjects are advised to submit requests using the online contact form on the EDPS website which uses Hypertext Transfer Protocol Secure (HTTPS) to ensure security and confidentiality of the transmitted requests - The devices used by EDPS staff for professional purposes (laptops and tablets) are protected by robust encryption measures - The Case Management System is protected with encryption. The production environment is accessible on the basis of a user account and a certificate created for each user. If only one of the two elements is present / active, the system cannot be accessed - Within the Case Management System, access control lists are in place. Access to the electronic case files of data subject requests is limited on a need-to-know basis to the EDPS staff handling such requests - Paper files, where applicable, are stored in locked cupboards and archive - Physical access to the premises of the EDPS is protected, and restricted to authorised personnel - EDPS staff are under the obligation of professional secrecy under Article 56 of Regulation (EU) 2018/1725, as well as the general confidentiality obligation under the Staff Regulations |
| 13. | For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice: | <p>https://www.edps.europa.eu/data-protection/our-work/publications/other-documents/2026-01-12-edps-data-protection-notice-management-data-subject-requests_en</p> |

Security

Data Protection Notice