From: [redacted]
To: SUPERVISION <supervision@edps.europa.eu>
Sent at: 04/07/23 08:18:31
Subject: Re: Our ref.: 2022-1189 - D(2023) 1786 - Your complaint against EPSO

Dear SUPERVISION,

Please find attached my request for review.
Can you please acknowledge the reception of this email?

Thanks for your time.

Best regards

[redacted]

El vie, 23 jun 2023 a las 9:04 [redacted] escribió:

> Dear Supervision, [redacted]
>
> Any news on this? I have to prepare my reply.
>
> Thanks for your time
>
> Best regards
> ---
> [redacted]
> ---
>
> El mar, 20 jun 2023 a las 11:13, [redacted] escribió:
>
> > Dear Supervision, [redacted]
> >
> > Can someone please explain to me what the header CONFIDENTIAL means in this context?
> > "
> > Article 14(1)
> > Transparent information, communication and modalities for the exercise of the rights of the data subject
> > 1. **The controller shall take appropriate measures to provide any information referred to in Articles 15 and 16 and any communication under Articles 17 to 24 and 35 relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form**, using clear and plain language, in particular for any information addressed specifically to a child. The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the data subject, the information may be provided orally, provided that the identity of the data subject is proven by other means.

"

Can I share your reply with my lawyer?
Can I share your reply with a not-for-profit body, organisation or association? as per Article 67 Representation of data subjects

Thanks for your time

Best regards

[redacted]

El vie, 16 jun 2023 a las 14:42, SUPERVISION (<supervision@edps.europa.eu>) escribió:

> Dear Sir,
>
> Please find attached a letter signed electronically on behalf of Mr T. ZERDICK for the above mentioned subject.
>
> Kind regards,

SUPERVISION & ENFORCEMENT UNIT

| Tel. (+32) 228 31900 | Fax +32(0)22831950 | ›
Email Supervision@edps.europa.eu
European Data Protection Supervisor
Postal address: Rue Wiertz 60, B-1047 Brussels
Office address: Rue Montoyer 30, B-1000 Brussels
@EU_EDPS www.edps.europa.eu

To: supervision@edps.europa.eu

To whom it may concern,

I am writing to you regarding your reply 23-06-16 Letter to [redacted] (e-signed) - 2022-1189.pdf

Factual grounds

- On 18/6/2022 I requested some data to EPSO (EPSOCRS-83314) regarding some of my applications that could be found on my EPSO profile at that time. Specifically I requested:

  "Dear Data Controller,
  I would like to exercise my right of access by the data subject (under article 17) for the following application numbers in their correspondent selection procedure :
  ** 4220689*
  ** 3921833*
  ** 700311*
  ** 539001*
  Specifically I would like to know:
  ** If my personal data is still being processed.*
  ** The recipients to whom my personal data have been disclosed. I would like to get detailed report of when and by whom my personal data was accessed Thanks for your time.*
  Best regards"

- On 3/7/2022 I did a follow up as no information was provided:
  "Hi,
  I haven't received any update regarding this ticket EPSOCRS-83314(18.06.2022 - 22:33)
  Can you give me any updates?
  Should I address this issue to the Data Protection Officer DATA-PROTECTION-OFFICER@ec.europa.eu?
  Thanks for your time
  Best regards"

- On 5/8/2022 I received an email with no the information I requested. Attached:
  - EPSO reply D6083997.pdf
  - EPSO reply - Annex II - Indication of the role of authorised EPSO recipients.pdf
  - EPSO reply - Annex I - Indication of the status - Processing of personal data.pdf

- On 25/07/2022 I sent an email (that became a long thread) with subject "Data Access Request not replied after 1 month" regarding EPSOCRS-83314 from 18/6/2021. I was also very specific with my request:
  "[…]
  Specifically I would like to know:
  The recipients to whom my personal data have been disclosed.

The recipients that accessed my personal data (CV, profile, application, etc)
The time of each access

[…]“

- On 20/11/2022 I even re-focused the request being less strict:
  “[….]
  Could you please try with a very specific request to EPSO's DPO?
  "
  I would like know when my personal data was access **by EUIPO/OHIM's personnel** (OHIM is former EUIPO's name)
  I need to know when EUIPO/OHIM has accessed my personal data in order to work on my letter before action. Knowing the time window of these accesses is essential.
  "
  [….]”

  I made crystal clear that I needed the info for taking legal actions.

- On 20/1/2023 I made a comment regarding a similar case law GDPR related but as EUDPR Article 17(1)(c) and GPDR Article 15(1)(c) are equivalent on the principles I thought it would clarify the matter:
  “[….]
  I would like to make a point and relate it to Case C-154/21
  https://curia.europa.eu/juris/document/document.jsf?text=&docid=269146&pageIndex=0&doclang=EN&mode=req&dir=&occ=first&part=1&cid=66061
  "
  39 Thus, in order to ensure the effectiveness of all of the rights referred to in the preceding paragraph of the present judgment, the data subject must have, in particular, the right to be informed of the identity of the specific recipients where his or her personal data have already been disclosed.
  "
  I know that the law that applies to my complaint is the EUDPR and not the GDPR but they are quite similar regarding the Principles and I am not even requesting the identity. The category (EUIPO Personnel could be a category) would be enough.
  […]”

- On 7/2/2023 I was requested to contact EUIPO’s DPO. I replied the same day that EUIPO’s DPO on an email from 22/7/2022 suggested me to contact EC’s DPO. Also in another email I suggested EC’s DPO to contact EUIPO’s DPO and clarify the matter.

- On 15/2/2023 EC’s DPO replied me:
  “[….]
  Thank you for your email. Do you authorise our office to share your personal data and the details concerning your request with the DPO of EUIPO, Ms. Gloria Folguera Ventura? This would allow us to determine which European Institution is competent.
  [….]”

  The same day, I agreed to share all my data and details with EUIPO’s DPO

- Finally on 31/3//2023 I received and email from EUIPO’s DPO:
  “[….]
  Your most recent request concerns exactly the same as your previous requests for which the Commission DPO has informed you several times that they fall outside of the remit of the

Commission. As coordinating and handling of replies to those multiple requests creates unnecessary workload and has resulted in a disproportionate administrative burden on the Commission, it is my assessment that your request falls under the scope of Article 14(5) of Regulation (EU) 2018/1725, which provides that:

> Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may refuse to act on the request.

In light of the above, I conclude that your request is manifestly unfounded and excessive within the meaning of Article 14(5) of Regulation (EU) 2018/1725. As a result, please note that further requests within the same scope will be disregarded.
[….]"

NOTE: EDPB's Guideline 01/2022 on data subject rights **-** Right of access[1] is about GDPR but GDPR and EUDPR right of access should be equivalent.

Final considerations

I would like to make some points regarding your reply:

- I have never requested EPSO's employees recipients specifically so point i) doesn't make any sense here. Any recipient or third party would have been a perfect reply. As a matter of fact I reduced the scope to OHIM/EUIPO recipient (as a whole entity not specifically employees) on my email from (20/11/2022). Nothing was never delivered even after some communication between EPSO and EUIPO.

- Regarding your point ii) my reference to C-154/21 fully applies here as OHIM/EUIPO are recipients of my data. Applications 4220689 and 3921833 were OHIM/EUIPO's CAST and EUIPO contacted me on both outside the scope of data controller activities. Also there should be other recipients and third parties as I have been contacted from other of the applications so there must be some recipients (outside the EPSO/EUIPO/OHIM scope) that have accessed my personal data and decided to contact me. At this moment I have zero information about those recipients.

- After around 9 months I have received 0 logs. EUDPR talks about 1 month with an extension of an additional month for complicated requests. The European Commission has shown nothing but non EUDPR compliance, laziness and 0 respect for time and my rights. The argument exposed in your point i) *"Are EPSO's employees recipients of your personal data?"* could have been used at the very beginning of our interaction, instead EPSO made me believe that someone was looking into it to finally (after nine months) accuse me of data weaponization.
  EUDPR is quite clear about this: *"The controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request."*. In accordance with the EDPB Guidelines 10/2020 on restrictions under Article 23 GDPR, *"any limitation to the fundamental right to data protection needs to be proportionate, restrictions should be interpreted narrowly, and only applicable in specifically provided circumstances where certain conditions are met;"*

- A few days after EPSO's latest reply I logged in into my EPSO profile and I checked that almost all the profile has been purged. All but the 700311 application are gone. Not only

1 https://edpb.europa.eu/system/files/2023-04/edpb_guidelines_202201_data_subject_rights_access_v2_en.pdf

EUIPO and EPSO haven't provided any data. Someone took the time to delete most of my applications. I have seen previously this same behavior in EUIPO that has been continuously manipulating my SuccessFactor profile but I didn't expected this from EPSO too.

It seems that EPSO and the EUIPO with their unlawful processing of my data have inspired the Recital 39 and Example 6 of the latest European Data Protection Board' latest guideline on Right of access:

"[…]
39. Furthermore, the controller shall not deliberately escape the obligation to provide the requested personal data by erasing or modifying personal data in response to a request for access (see 2.3.2). If, in the course of processing the access request, the controller discovers inaccurate data or unlawful processing, the controller has to assess the state of the processing and to inform the data subject accordingly before complying with its other obligations. In its own interest, to avoid the need of further communication on this as well as to be compliant with the transparency principle, the controller should add information about the subsequent rectifications or deletions.

Example 6: On the occasion of replying to an access request a controller realises, that an application of the data subject for a vacancy in the company of the controller has been stored beyond the retention period. In this case the controller cannot delete first and then reply to the data subject that no data concerning the application) is processed. It has to give access first and delete the data afterwards. In order to prevent a subsequent request for erasure it would then be recommended to add information about the fact and time of the deletion.
[…]"

Storing is a data processing activity as per EUDPR Art. 4(2):
"(2) | 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, **storage**, adaptation or **alteration**, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, **erasure or destruction**;"

EPSO/EUIPO were processing (as in storing) my personal data for the mentioned applications and instead of providing me with the requested data decided to delete some of my applications and accuse me of request weaponization with my DSRs and my follow up emails.

- This case falls under EUDPR Art. 28 as EPSO and EUIPO are joint controllers that should have been transparent and determine their respective responsibilities. **No one has given me the requested data.** Basically EUIPO and EPSO have been pointing fingers to each others during many months wasting my limited free time and failing EUDPR's mandate to reply my request without undue delay and show some compliance.

- Here you are a table with my candidates' application numbers, the selection procedure they belong to, the correspondent primary data controller and its status:

Application number	Description	Primary Data Controller	Status
4220689	EUIPO/CAST/1/16 - 6 – INFORMATION TECHNOLOGY/PROJECT MANAGEMENT SPECIALIST - Function Group IV (FG IV)	EUIPO	**ERASED**
3921833	OHIM/CAST/10/2014 FG III - FG III	EUIPO	**ERASED**
700311	EPSO/CAST27/5/07 CAST27 (RELEX) - FG III	EC	**OK**
539001	EPSO/TA/IT/06 IT Temporary Agents IT	EC	**ERASED**

- By not providing the requested data EPSO and EUIPO have denied me of right to verify the lawfulness of their processing (carried out by EPSO/EUIPO).

- EPSO/EUIPO are responsible for, and must be able to demonstrate compliance with its obligation to grant data subjects' access right under article 17 of the EUDPR, and to observe the principle of transparency, and that for this reason, the lack of appropriate reply from EPSO/EUIPO is a violation of the principle of accountability. The EDPS has 3 documents about accountability in EU institutions.
- Transparency after 9 months is not transparency at all. But in this case even after waiting 9 month I haven't received anything.

- Additionally, the CJEU repeatedly stated that the right of access is necessary to enable data subjects, depending on the circumstances, to exercise other data protection rights[2] as set forth in Chapter III of the EUDPR/GDPR, and to seek judicial action in the event that they suffer harm and to obtain damages, pursuant to article 64 and article 65 of the EUDPR. In particular, the judgment "RW vs Osterreichische Post" clarified that "Article 15(1)(c) of the GDPR is one of the provisions intended to ensure transparency vis-a-vis the data subject of the manner in which personal data are processed and enables that person, as the Advocate General observed in point 33 of his Opinion, to exercise the rights laid down, inter alia, in Articles 16 to 19, 21, 79 and 82 of the GDPR"[3]. It therefore follows that the complainant shall have the right to receive a copy of her personal data, including any information in relation to the source of her personal data in terms of article 17(1)(g) of the EUDPR in order to enable her to exercise her data protection rights to the fullest extent as provided by law.

- Also, recent case J.M v Pankki J.M vs Pankki S (Case C-579/21) concerns the interpretation of 15(1) of the GPDR, that is equivalent to article 17(1) of the EUDPR
  [...]
  2. Article 15(1) of Regulation 2016/679

  must be interpreted as meaning that information relating to consultation operations carried out on a data subject's personal data and concerning the dates and purposes of those operations constitutes information which that person has the right to obtain from the controller under that provision. On the other hand, that provision does not lay down such a right in respect of information relating to the identity of the employees of that controller who carried out those operations under its authority and in accordance with its instructions, unless that information is essential in order to enable the person concerned effectively to

2 C-434/16, Nowak and joined cases C-141/12 and C-372/12, YS and Others.
3 C-154/21, judgment of the 12th January 2023, paragraph 42.

exercise the rights conferred on him or her by that regulation and provided that the rights and freedoms of those employees are taken into account.
[…]

EPSO/EUIPO haven't provided any information relating to consultation operations carried out on a data subject's personal data and concerning the dates and purposes of those operations constitutes information which that person has the right to obtain from the controller under that provision.

- At this moment, it is clear based on EPSO/EUIPO behavior that they have been wasting my limited free time and that there was never the intention to fulfill any obligations under the EUDPR.
- Regarding web access logs, they are personal data as they contain enough data to identify me. Eg: IP, session cookies, customized URLs, browser and operating system versions, etc. EPSO/EUIPO have provided nothing.
  On EDPB's guide the following can be found:
  "[…]
  97. Thus, subject to the specific facts of the case, when assessing a specific request for access, the following types of data are, inter alia, to be provided by controllers without prejudice to Art. 15(4) GDPR:
  […]
  Data knowingly and actively provided by the data subject (**e.g. account data submitted via forms**, answers to a questionnaire).
  Observed data or raw data provided by the data subject by virtue of the use of the service or the device (e.g. data processed by connected objects, **transaction history, activity logs such as access logs, history of website usage**, search activities, location data, clicking activity, unique aspects of a persons behaviour such as handwriting, keystrokes, particular way of walking or speaking);
  […]"

- Regarding EPSO/EUIPO's internal logs about the purposes of accessing my data, etc. They can contain employees data so I am ok if this identifiable information is redacted

  On EDPB's guideline on Right of access the following can be found:
  "[…]

  The general concern that rights and freedoms of others might be affected by complying with the request for access, is not enough to rely on Art. 15 (4) GDPR. **The controller must be able to demonstrate that in the concrete situation, rights or freedoms of others would, in fact, be impacted.**

  Example 34: A person who is now an adult was cared for by the youth welfare office over a number of years in the past. The corresponding files may possibly contain sensitive information about other persons (parents, social workers, other minors). However, a request for information from the data subject cannot generally be rejected for this reason with reference to Art. 15(4) GDPR. Rather, the rights and freedoms of others must be examined in detail and demonstrated by the youth welfare office as the controller. Depending on the interests in question and their relative weight, providing such specific information may be rejected **(e.g. by redacting names)**.

[…]“

Redacting the names, username, etc is a balanced option between my rights and the right of others.

Also this is aligned with recent recent case J.M vs Pankki S (Case C-579/21) that concerns the interpretation of 15(1) of the GPDR, that is equivalent to article 17(1) of the EUDPR:

“[…]
2.Article 15(1) of Regulation 2016/679
must be interpreted as meaning that information relating to consultation operations carried out on a data subject’s personal data and concerning the dates and purposes of those operations constitutes information which that person has the right to obtain from the controller under that provision. On the other hand, that provision does not lay down such a right in respect of information relating to the identity of the employees of that controller who carried out those operations under its authority and in accordance with its instructions, unless that information is essential in order to enable the person concerned effectively to exercise the rights conferred on him or her by that regulation and provided that the rights and freedoms of those employees are taken into account.
[…]”

Request:

Under Chapters III and VIII of the EUDPR I am requesting the following:

1. That my EPSO profile is restored to a point in time just before the purge (EPSO applications and EUIPO CAST applications).
2. The timestamp where my profile was purged and the purpose of doing this.
3. I want to exercise my right to object under Art. 23 (1).
4. I want to exercise my right to restriction of processing under Article 20 (d)
    1. Do not process my data anymore but for replying my requests (eg: DSRs, etc) as per Article 20(2).
    2. Mark all my data as not to be used.
    3. Freeze (or set as read only) my EPSO account
    4. Do not delete (again) nor modify any of my data, logs, etc.
5. A copy of all personal data on EPSO systems currently and recently deleted (as in deleted after my request for access). No matter if is a OHIM/EUIPO CAST or an EPSO application. This is a non-exhaustive list of personal data that should be provided:
    1. All version of the raw documents provided by me.
    2. All versions of my profile.
    3. Any kind of logs (audit, modifications, access, delete logs,etc).
    4. The time and purpose of each access.
    5. The recipients or third parties to whom my personal data have been disclosed.
    6. The recipients that accessed my personal data (CV, profile, application, etc).
6. The legal basis EPSO/EUIPO are relying on for processing my personal data.
7. The period for which my personal data has been and will be stored per application.
8. Whether or not my personal data has been shared with third parties and who those third parties are as well as the purpose and legal basis.
9. That EDPS treats this deletion of my profile as a data breach and acts accordingly.
10. I specifically demand that my personal data is restored and is not erased (again) as I consider it to be evidence for the purpose of a legal claim; and to do so would be a failure to comply with my demand to suspend processing of my personal data (see points 3 and 4), leading to additional breaches of the law.

Finally, I take the opportunity of this letter to remind you:

- EDPB guideline on Right of access[4]
- Guidance on documenting processing operations for EU institutions, bodies and agencies[5] by the EDPS:
    - Summary[6]
        - In a nutshell, those rules tell you to:
            - (1) have a good reason for processing people's data;
            - (2) tell them about it;
            - **(3) be accountable for both what you do and why you do it.**
    - Accountability on the ground Part I[7]

4 https://edpb.europa.eu/system/files/2023-04/edpb_guidelines_202201_data_subject_rights_access_v2_en.pdf
5 https://edps.europa.eu/data-protection/our-work/publications/guidelines/2019-07-16-accountability-ground-guidance-documenting-processing-operations-eu-institutions-bodies-and-agencies_en
6 https://edps.europa.eu/sites/default/files/publication/19-07-17_summary_accountability_guidelines_en.pdf
7 https://edps.europa.eu/sites/default/files/publication/19-07-17_accountability_on_the_ground_part_i_en.pdf

- Accountability on the ground Part II[8]

- The following paragraph from OLAF's web page:
  https://anti-fraud.ec.europa.eu/olaf-and-you/report-fraud_en
  […]
  If you are an EU staff member you have an obligation to report possible cases of fraud, corruption, other illegal activity, or professional conduct which may constitute a serious failure to comply with the obligations of EU staff members. You can either inform a member of management in your institution or OLAF about your suspicions. If you want to inform OLAF directly, please follow the steps described above, under the heading How to report to OLAF. For more information about the rights and obligations of whistleblower within the EU Institutions, please see Article 22a and 22b of the Staff Regulations.
  […]
- EUDPR's Arcicle 65 Right of compensation
- EUDPR's Arcicle 66 Administrative fines
- EUDPR's Article 69
  […]
  Sanctions
  Where an official or other servant of the Union fails to comply with the obligations laid down in this Regulation, whether intentionally or through negligence on his or her part, the official or other servant concerned shall be liable to disciplinary or other action, in accordance with the rules and procedures laid down in the Staff Regulations.
  […]

I reserve my right to seek further recourse at the Court of Justice of the European Union, the European Ombudsman, the European Anti-Fraud Office and the European Public Prosecutors Office.

Sincerely,

8 https://edps.europa.eu/sites/default/files/publication/19-07-17_accountability_on_the_ground_part_ii_en.pdf

Annexes

EPSO reply D6083997.pdf
EPSO reply - Annex II - Indication of the role of authorised EPSO recipients.pdf
EPSO reply - Annex I - Indication of the status - Processing of personal data.pdf

Subject: **Indication of the categories of authorised recipients of your personal data, and their function**

Mr Juan SIERRA PONS

Candidate no. 4220689
EUIPO/CAST/1/16 – 6 INFORMATION TECHNOLOGY/PROJECT MANAGEMENT SPECIALIST – Function Group IV

Candidate no. 3921833
OIHM/CAST/10/2014 Function Group III

Candidate no. 700311
EPSO/CAST27/5/07 CAST27 (RELEX) Function Group III

Candidate no. 539001
EPSO/TA/IT/06 IT Temporary Agents IT

There are two tools involved in the management of CAST and TA selection procedures:

- **Talent**, used to configure the selection process, manage applications, communication with candidates and manage tests, and
- **Recruiter Portal** (part of the Talent Pool suite), used to search and select successful candidates for recruitment.

User category	Function
EPSO Back-office Users	Management of all operational aspects of the selection procedure, communication with candidates, some IT support functions
IT Support Agents	IT administration of the Talent and Recruiter Portal software
HR / Recruiting Agents	Search and selection of successful candidates for recruitment, management of recruitment processes

The Director

Brussels, 05/08/2022
EPSO.001/RK/mr ARES (2022)s. 6083997

Mr Juan SIERRA PONS
✉ *juan@elsotanillo.net*

Subject: **Request for access to personal data**
Selection procedures EUIPO/CAST/1/16-6, OIHM/CAST/10/2014 FG III, EPSO/CAST27/5/07 CAST27 (RELEX) FG III, EPSO/TA/IT/06 IT

Ref.: Your request of 18 June 2022

Dear Mr Sierra Pons,

I refer to your above-referenced request for access to personal data pursuant to Article 17 of Regulation (EU) 2018/1725.

First of all, please accept our apologies for the delay of our reply.

You formulated your request in the following terms:

"I would like to exercise my right of access by the data subject (under article 17) for the following application numbers in their correspondent selection procedure:

- *4220689*
- *3921833*
- *700311*
- *539001*

Specifically I would like to know:

- *If my personal data is still being processed.*
- *The recipients to whom my personal data have been disclosed.*

I would like to get detailed report of when and by whom my personal data was accessed."

Article 17 of Regulation (EU) 2018/1725 provides as follows:

Article 17 - Right of access by the data subject

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

(a) the purposes of the processing;

(b) the categories of personal data concerned;

(c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;

(d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

(e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;

(f) the right to lodge a complaint with the European Data Protection Supervisor;

(g) where the personal data are not collected from the data subject, any available information as to their source;

(h) the existence of automated decision-making, including profiling, referred to in Article 24(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 48 relating to the transfer.

3. The controller shall provide a copy of the personal data undergoing processing. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

In reply to your request, please find enclosed the following information relating to your participation in the selection procedures EUIPO/CAST/1/16 – 6, OIHM/CAST/10/2014 FG III, EPSO/CAST27/5/07 CAST27 (RELEX) FG III and EPSO/TA/IT/06 IT:

- an indication of the status of the processing of your personal data by EPSO, taking into account the data retention periods during which EPSO is entitled to process the personal data in question.

- an indication of the authorised recipients of your personal data and their function.

Furthermore, I would like to clarify that under Article 17 of Regulation (EU) 2018/1725, you are not entitled to obtain a "*detailed report of when and by whom [your] personal data was accessed*". However, you are entitled to obtain information concerning the categories and function of the recipients of your personal data.

Yours sincerely,

Minna VUORIO

Annexes:

1./ Indication of the status of the processing of your personal data by EPSO.

2./ Indication of the categories of authorised recipients of personal data and their function.

ANNEX I

Subject: Indication of the status of the processing of your personal data by EPSO, taking into account the data retention periods during which EPSO is entitled to process the personal data in question.

In accordance with the specific privacy statement on personal data protection within the framework of each category of selection procedure[1], which you accepted when creating your EPSO account, the status of the processing of your personal data within the framework of the four selection procedures you mentioned in your request are as follows:

Mr Juan SIERRA PONS

Candidate no. 4220689
EUIPO/CAST/1/16 – 6 INFORMATION TECHNOLOGY/PROJECT MANAGEMENT SPECIALIST – Function Group IV
The processing period of your personal data within the framework of this selection procedure, including the retention period, ended.

Candidate no. 3921833
OIHM/CAST/10/2014 – Function Group III
The processing period of your personal data within the framework of this selection procedure, including the retention period, ended.

Candidate no. 700311
EPSO/CAST27/5/07 CAST27 (RELEX) Function Group III
Your personal data within the framework of this selection procedure is still processed, due to the recruitment reserve database of EPSO/CAST27/5/07 being open until 31 December 2022.

Candidate no. 539001
EPSO/TA/IT/06 IT Temporary Agents IT
The processing period of your personal data within the framework of this selection procedure, including the retention period, ended.

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1 The privacy statement summarising the applicable rules is available here: https://europa.eu/epso/application/passport/index.cfm?action=pdplegal&sb=1&lang=en&comp_id=.