

PRIVACY NOTICE FOR THE OLAF MONITORING SITE

1. DESCRIPTION OF THE PROCESSING OPERATION

The OLAF Monitoring Site (hereinafter referred to as "the Monitoring Site") is a SharePoint-based communication tool used by OLAF to facilitate the monitoring of administrative and financial recommendations:

- The Monitoring Site is used in the communication between OLAF and enrolled entities, acting as recipients of OLAF financial and administrative recommendations (hereinafter referred to as "recipients"). Enrolment in the Monitoring Site is possible for recipients that are under the coordination or supervision of the European Commission.
- The Monitoring Site facilitates the centralisation of information on administrative and financial monitoring, received either directly in the Monitoring Site from enrolled recipients, or via different communication channels, including from recipients that are not enrolled.

Information and data communicated and stored in the Monitoring Site are related to follow-up actions taken with regard to administrative and financial measures recommended by OLAF (e.g. amounts established or/and recovered). All users are requested not to encode information which may be qualified as personal data in accordance with Regulation (EU) No 2018/1725. No documents are stored nor exchanged on the Monitoring Site.

The Monitoring and Reporting Unit in OLAF is the designated entity to coordinate the exchanges of information and users' access to information, acting as delegated controller of this processing operations.

Registration and access in the Monitoring Site is managed by the delegated controller and granted individually to relevant OLAF staff and designated representatives of the enrolled recipients. OLAF collects the first name, last name, professional e-mail and the entity of employment, as retrieved from the Central User Database stored at the Data Centre of the European Commission. OLAF may process users' identification details to contact them, where necessary.

View and/or editing rights in the Monitoring Site are established by the delegated controller on different levels and groups of users. Each group has access only to the information necessary to perform requested updates and the system maintains an audit trail.

Specific parts of the monitoring information encoded in the Monitoring Site are copied on a regular basis in the OLAF Case Management System, together with the identification details of the users who recorded it.

The processing of personal data will not be used, or re-used, for automated decision making including profiling.

2. LEGAL BASIS FOR THE PROCESSING

OLAF processes above defined personal data, because its processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body. OLAF performs this processing operation based on Article 5 paragraph 1(a) of Regulation (EU) No 2018/1725.

OLAF issues recommendations for financial and administrative action and monitors their follow-up on the basis of Article 11 of the OLAF Regulation (EU, Euratom) No 883/2013.

3. CATEGORIES OF PERSONAL DATA COLLECTED

OLAF collects personal data in order to enable this processing operation. The personal data accessible from the Monitoring Site is as it follows:

Mandatory information about the Monitoring Site users, represented by their identification data (username, first name, last name, email address, entity of employment).

The identification data is retrieved by an automatic process from the European Commission's Central User Database, which is stored at the Data Centre of the European Commission. The Data Centre of the European Commission is bound to comply with Regulation (EU) No 2018/1725 and with any Commission's security decision and provision established by the Directorate General of Security and Human Resources for this kind of servers and services (Decision No 2017/46).

The system keeps an audit trail of the activities and updates performed by users.

4. WHO HAS ACCESS TO YOUR INFORMATION AND TO WHOM IS IT DISCLOSED?

OLAF staff responsible for carrying out this processing operation has access to Monitoring Site user's personal data. Other OLAF staff has access to such information on a need to know basis.

User's personal identification information (first name, last name, email address, entity of employment) may be visible to other non-OLAF data subjects who have been granted similar access permissions to specific parts of monitoring information.

5. HOW DO WE PROTECT AND SAFEGUARD YOUR INFORMATION?

In order to protect personal data, a number of technical and organisational measures have been put in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the data being processed. Organisational measures include restricting access to the data to authorised persons with a legitimate need to know for the purposes of this processing operation.

6. HOW LONG DO WE KEEP YOUR DATA?

Your personal data is associated with your user account information and performed operations.

Personal data is retained by OLAF as part of the audit trail of the information collected on the implementation of OLAF administrative and financial recommendations.

The maximum retention period of data held in the Monitoring Site is 15 years after the finalisation of the processing activities related to the investigation for which information on monitoring of the recommendations was exchanged.

The delegated controller will assess on a regular basis, as part of its monitoring activities, which information qualifies for deletion from the Monitoring Site.

7. WHAT ARE YOUR RIGHTS AND HOW YOU CAN EXERCISE THEM?

You have the right to request access to your personal data, rectification or erasure of the data, or restriction of their processing.

Any request to exercise one of those rights should be directed to the Controller (OLAF-FMB-DATA-PROTECTION@ec.europa.eu). Where you wish to exercise your rights in the context of one or several specific processing operations or files, please provide their description and reference(s) in your request.

No restrictions would apply on data subject rights for this processing operation.

8. CONTACT DETAILS OF THE DATA PROTECTION OFFICER

You may contact the Data Protection Officer of OLAF (OLAF-FMB-DPO@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) No 2018/1725.

9. RIGHT OF RECOURSE

You have the right to have recourse to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) No 2018/1725 have been infringed as a result of the processing of your personal data by OLAF.