

## WHISTLEBLOWING

### *Key information*

#### **Controller**

Cesare Onestini, Director of the ETF, [Cesare.Onestini@etf.europa.eu](mailto:Cesare.Onestini@etf.europa.eu)

#### **Process owner**

Nadège Perrine, Head of HR Unit, [Nadège.Perrine@etf.europa.eu](mailto:Nadège.Perrine@etf.europa.eu)

#### **Data protection officer**

Tiziana Ciccarone / Laurens Rijken, [DataProtectionOfficer@etf.europa.eu](mailto>DataProtectionOfficer@etf.europa.eu)

#### **Purpose of the processing**

Whistleblowing procedures are intended to provide safe channels for anyone who becomes aware and reports potential fraud, corruption, or other serious wrongdoings and irregularities and therefore ensure the protection of the personal information of the whistleblowers, the alleged wrongdoers, the witnesses and the other persons appearing in the relevant report(s). Often the above procedure implies processing of personal data as well as sensitive data.

#### **Legal basis**

The legal basis for the processing operations of personal data is:

- ETF Policy on whistleblowing ref. ETF/15/DEC/008

#### **Personal data**

Personal data concerned are name, behaviours and any personal data, which can make a subject identified or identifiable.

Sensitive information, such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade- union membership, and data concerning health or sex life shall be processed on a strictly needed basis.

#### **Recipients of the personal data**

For the purpose detailed above, access to personal data is provided to the following processing entities:

- *Internal recipients are:* Strictly on a need-to-know basis: e.g. ETF investigators (if appointed on ad hoc basis), ETF Ethics and Integrity Correspondent, ETF OLAF Correspondent, ETF Confidential counsellors, ETF head of HR, ETF Director.
- *External recipients are:* The requirements for transferring data are assessed on a case-by-case basis. In particular, personal information are transferred only when necessary for the legitimate performance of tasks covered by the competence of the recipient (e.g. Court different from Court of Justice).

## *Further information*

### **Data retention**

Personal information that is not relevant to the allegations are not further processed.

When the case is not referred to OLAF or is not within the scope of the whistleblowing procedure the report is deleted as soon as possible and usually within two months of completion of the preliminary assessment.

If the report is transferred to OLAF who starts an investigation it is not necessary for the ETF to keep the information for a longer period.

### **Right of access, rectification or erasure, restriction, objection**

Any request to access, rectify or erase personal data, or to restrict or object to the processing of personal data shall be addressed in writing to the Head of Human Resources Unit, [npe@etf.europa.eu](mailto:npe@etf.europa.eu).

Deferral of information is decided on a case by case basis when there is a high risk that giving access to data subjects would hamper the procedure or undermine the rights and freedom of the others.

### **Right to lodge complaint**

Data subjects can at any time lodge a complaint on the processing of their personal data to the ETF Data Protection Officer ([DataProtectionOfficer@etf.europa.eu](mailto>DataProtectionOfficer@etf.europa.eu)) or to the European Data Protection Supervisor (<http://www.edps.europa.eu>).

### **Necessity of provision of data**

The provision of data is necessary to launch a whistleblowing procedure.