

ANTI-HARASSMENT

Key information

Controller

Cesare Onestini, Director of the ETF, Cesare.Onestini@etf.europa.eu

Process owner

Nadège Perrine, Head of HR Unit, 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

The purpose of processing is to prevent and/or manage psychological and sexual harassment at the ETF.

Legal basis

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

- Staff Regulations Articles 1d, 12a, 24, 86, 90
- Governing Board decision on ETF Policy on protecting the dignity of the person and preventing psychological harassment and sexual harassment (ref. GB/19/DEC/002 of 10 May 2019)
- Manual of procedures within the framework of the ETF Policy on protecting the dignity of the person and preventing psychological harassment and sexual harassment

Personal data

Personal data concerned are name of alleged victim and alleged harasser.

The processing of personal data during an informal procedure may require the processing of sensitive data (e.g. health or sex life of data subjects).

Recipients of the personal data

Confidential Counsellors, HR Officer in charge, ETF Medical Advisor if health at risk, Appointing Authority for recurrent cases or in formal procedures. Investigators (internal or external) may be appointed for formal procedures.

Further information

Data retention

Within the informal procedure, data collected:

- in the opening and closing fiche are retained for a maximum of 5 years from the start date of the informal procedure
- from the alleged victim no more than three months after the closure of the case; when this term expires, the documents are returned to the alleged victim or forwarded to the HR Officer in charge, with the alleged victim's prior consent

- Data related to an alleged harasser not informed of the existence of an informal procedure are not retained

Data may be held for further 5 years when a judicial or administrative procedure is still ongoing.

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.

Right to withdraw consent

Any request withdraw consent to the processing of personal data shall be addressed in writing to the Head of Human Resources Unit, npe@etf.europa.eu.

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 start an informal procedure.