

Public Register of Records of Processing Activities according to Art. 31 Regulation EU 1725/2018¹

Name of the processing operation	Controller / Processor		Purpose(s) of the processing	Category of Data subjects	Category of data	Recipients ¹	Time limit for blocking and erasure	Security measures adopted (general description)	Transfer to third countries or international organisations
	Organisational part concerned	Contact person							
Resolution Plans Chapter 5 and corresponding Annexes	All SRB Resolution Units	SRB-Dataprotection-Resolutionplanning @srb.europa.eu	Chapter 5 Information and Communication Plan + corresponding Annexes. Legal Basis: obligation acc. to Article 5(1)(b) Regulation EU 2018/1725, in particular Article 31 of Regulation 806/2014.	Bank employees or staff at national competent or resolution authorities.	Contact details	SRB staff in relevant units and NRA staff (within the IRT)	Yearly	The contact details are treated as confidential and reviewed yearly.	NO
Resolution Colleges planning and organization	All SRB Resolution Units	SRB-Dataprotection-Resolutionplanning @srb.europa.eu	Organisation of Resolution Colleges Legal basis: Article 53(1) of the Delegated Regulation 2016/1075, Article 31 of Regulation 806/2014.	SRB staff; Staff at: Consolidating Supervisor; Resolution Authorities; Competent Authorities, Competent Ministries; Deposit Guarantee Scheme	Contact details	SRB staff in relevant Resolution Units; ECB	Contact details are kept as long as the representative is member and/or observer of the resolution college	The contact details are annually updated for each resolution planning cycle and treated confidential.	YES Supervisory and Resolution Authorities of Third countries, Ministry of Finance of Third countries, DGSS Information are exchanged under the confidentiality arrangements

¹ Contact details SRB DPO: SRB-DPO@srb.europa.eu

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Written Arrangements of the Resolution Colleges events or meetings	All SRB Resolution Units	SRB-Dataprotection-Resolutionplanning@srb.europa.eu relevant Unit	The contact list in the Written Arrangements is used to organise meetings of Colleges, Committees, Crisis Management Groups Networks, Taskforces, Trainings, Board Sessions, Conferences, External visitors, Workshops and Press events or Academia discussions The list also contains contact details for emergency situations Legal Basis: Article 31 of Regulation 806/2014.) Registration and security check at the entrance into SRB premises	Staff at: Consolidating Supervisor; National Resolution Authority; National Competent Authority; Competent Ministry; Deposit Guarantee Scheme	Contact details	SRB and other relevant EU resolution authorities	Every two years after the Resolution college took place. Or update without undue delay if a new contact person is appointed.	The contact list is treated as confidential and processed in compliance with the legal obligation.	In specific cases ("home-host situation") an equivalence assessment is performed ex ante
List of contacts for resolution purposes: ECB, EBA, NRA, NCB	SRB Head of Unit (HoU) and DP Representative of Resolution units;	SRB-Dataprotection-Resolutionplanning@srb.europa.eu	To manage resolution planning activities, to facilitate	Participants in Resolution Teams, Crisis Management	Contact details	SRB Staff at relevant Resolution Units and at	The contact details are annually updated for	The contact list is treated as confidential and processed	YES Supervisory and Resolution

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or NCA counterparts (in the SRM, BRRD or SSM context)	SRB Corporate Secretariat		meeting preparations and organization as well as to exchange information on other relevant business and policy related issues. Legal Basis: Article 31 of Regulation 806/2014	Group, Resolution College, Taskforce etc.		Corporate Secretariat; ECB	each resolution planning cycle	in compliance with a legal obligation.	Authorities and Ministry of Finance of 3 rd countries. Information are exchanged under the confidentiality arrangements
Access to SRB premises for events or meetings	SRB all units	Secretary of the relevant unit	Collection of data for access to SRB premises; Dispatch of documentation for meetings of Colleges, Committees, Crisis Management Groups Networks, Taskforces, Trainings, Board Sessions, Conferences, external visitors, Workshops and Press events or Academia discussions	Attendees to the events or the meetings	Contact including ID card details	SRB reception and facilities team	Kept only until the day of the meeting	Access rights to files with personal data limited to the team dealing with the event. Deletion of non-relevant data (e.g. when the person is no longer part of the relevant working group	NO

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			Registration and security check at the entrance into SRB premises						
Access to documents requests	SRB Legal Team and Corporate Secretariat,	SRB-Access-to-documents@srb.europa.eu	Treatment of requests for access to documents from individuals, in line with Regulation EC 1049/2001.	Individuals requesting access to SRB documents	Contact details	SRB Legal team	10 years	Restriction of ICT access right to persons in charge of the topic	NO
Litigation related work	SRB Legal Services Litigation Team	Srb-legal@srb.europa.eu	Representation of the SRB in proceedings before the European Courts and other Authorities task carried out in the public interest or in the exercise of official authority vested in the SRB (legal basis: SRMR or BRRS where applicable and / or SRB legal acts (Conditions of Employment, Staff Rules etc.)	SRB staff	General professional personal data	Designated SRB staff members	5 years	SRB collaboration platform/ IMAS DARWIN, ARES	YES
Compliance activities	Compliance	SRB-Compliance@srb.europa.eu Ethics and Compliance Officer	Internal Compliance Activity in line with the SRB Code of Ethics and Staff Regulations (e.g.	SRB staff, Non-SRB staff: NRA, NCB or NCA counterparts,	Contact details and financial data (financial products) and details about	SRB HR SRB Board Members	5 Years for other after closure of secrecy protocol or	Locked Compliance cupboards	NO

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			internal administrative inquiries, check of absence of conflict of interest declarations, secrecy protocols, etc.)	Contractors providing goods and services, Complainants, correspondents and enquirers, SRB Staff and SNEs.	SRB staff's outside activity	SRB Internal Controller	termination of employment		
Data Protection activities	Data Protection Office	SRB-DPO@srb.europa.eu	Data Protection activities in line with Regulation EU 2018/1725	SRB staff and potentially affected external counterparts)	All categories of personal data depending on the individual matter	SRB DPO, SRB Chair, EDPS	In line with the SRB Retention Policy	Locked cupboards, restricted access to functional mailbox and DP intranet space	NO
Internal Audit	Internal Audit	SRB Internal Auditor	Internal audit activity in line with SRMR Art. 62 and SRB Financial Regulation Art. 78	Identification data, contact data, professional data and data related to or brought in connection with the subject matter of the activity, special categories of personal data. SRB staff Non-SRB staff NRA, NCB or NCA counterparts	Contact details		Internal audit: 6 years after closure of audit engagement	Internal audit: For electronic documents, access rights limited to Internal Audit Destruction of hard copies after audit engagement	NO

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				Contractors providing goods and services Complainants, correspondents and enquirers SRB Staff and SNEs.					
Finance / Accounting/ Procurement activities regarding SRB staff, experts and suppliers	SRB Finance/ Procurement and Accounting	SRB-Finance@srb.europa.eu SRB-Procurement@srb.europa.eu SRB-Accounting@srb.europa.eu	Approval of payments (suppliers general, resolution, recruitment) and Bank account management Payment of salaries (SR, Art.62, CEOS, Art.19-20) Payments to suppliers as per Financial Regulation	Suppliers' contact person, staff, recruitment candidates, Appeal Panel members	Contact details	SRB Finance SRB Accounting SRB Procurement Relevant SRB unit	5 years	Restricted Access, files archived immediately after approvals	NO
Visitors log book	Protection Unit guards and the SRB Facilities unit	Facilities@srb.europa.eu	Security & safety reasons (e.g. case of evacuation). Logs may, on a case-by-case basis also be used for investigating security incidents	SRB staff members Visitors to the SRB premises	Contact details, signature, nationality	The Protection Unit company service provider and the EC HR DS unit	6 months	The Visitors log books are collected every week and stored in a safe cabinet at the Protection Unit company headquarters.	NO

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			in accordance with applicable procedures					The logs are destroyed in accordance with the retention policy.	
Video surveillance system	SRB Facilities and EC HR DS unit	Facilities-team@srb.europa.eu	<p>Protecting the SRB's staff, visitors' premises and operations</p> <p>Prevent, detect and then document any security incident that occurs in buildings or in the surrounding areas,</p> <p>Legal basis: EC Decision C(94) 2129 of 08/09/1994 and EC Decision 2001/844/EC, ECSC, Euratom of 29/11/2001</p>	All persons accessing the SRB premises	The footage with images of persons within the SRB premises	EC HR DS Unit and EC authorised technicians servicing the system	30 days as per Belgian law of 21/03/2007 governing installation and use of surveillance cameras (Article 6(3))	Restricted access to the system,	NO
Access control system	SRB Facilities (requests for renewal of access badges)	Facilities-team@srb.europa.eu	To ensure physical security on the SRB premises by controlling access both to the SRB premises in	SRB staff members, Representatives of Plenary Session and Appeal Panel members, interims,	name & photo, badge number & validity-timestamp, ID of gate/ door, badge number	EC HR DS Access card service	The data is kept for 2 months from expiry/revocation of the badge, except for the access	Badge holders data and access logs are kept electronically with limited access.	NO

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			<p>general and to sensitive areas inside the SRB premises (e.g. archive rooms, server rooms);</p> <p>To keep track of how many people are in the building for evacuation purposes in line with EC's security decisions.</p>	security guards, contractors using special technical access badges			logs, which are kept for 2 months on a rolling basis.	Application of EC security procedures for the issuing of badges	
Biometrics access control system	SRB Facilities team (requests for creating access badges)	Facilities-team@srb.europa.eu	The security and protection of all persons present inside the SRB premises (e.g. to manage and keep track of all staff members) The security access control and protection of the SRB premises, information and assets; Compliance with safety requirements (e.g. knowledge of the most accurate number of persons still present inside the	SRB staff and non-SRB staff (Consultants, Contractors providing goods or services to the SRB)	The categories of sensitive personal data we process are: biometric data for the purpose of uniquely identifying a natural person. The type of data collected, mainly the fingerprint templates of two fingers and related identification information, corresponds to the data required to operate an	The DS team of the Access Card office of the European Commission, which are creating the access badges. 1 Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural	The SRB's Facilities team keeps the personal data for the time necessary to fulfil the purpose of collection or further processing (internal investigations, OLAF, etc.), plus a reasonable period thereafter in case personal	The SRB ICT has been consulted for the installation of the biometrics reading devices. They gave their opinion for connection to the servers and other technical aspects. The ICT systems are in no way connected with the PACS system and implicitly with	

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			<p>premises is required for evacuation and other emergency situations) Compliance with legal requirements: the prevention, investigation, detection and prosecution of disciplinary or administrative infractions or criminal offences A better control / monitoring of the access inside the building.</p>		<p>access control system based on biometrics[1]. The data registered by the Access Control System consists mainly of: date and time of access, number of badge, user's name/surname, access granted or not, card reader number).</p>	<p>persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39–98 (EUDPR). 2 In addition, Recital 22 of Regulation 2018/1725 further clarifies Article 5.1(a) stating that 'In order for processing to be lawful, personal data should</p>	<p>data is not necessary for verification of conduct of investigations on condition that no contentious issues occurred; in the latter cases, data will be kept until the end of the last possible (legal) procedure. The SRB badges are valid three years for two consecutive periods and afterwards, for five years (for an indefinite contract). The retention period starts once the badge is</p>	<p>the racks found in the SRB offices, this biometrics PACS system has its own patching rack and connections straight to the COMM. We keep data on badge holders and access logs electronically in systems with limited access and secured by standard EUI security practices in line with our ISO 27001-certified information security management system. The only information stored electronically on the badge</p>	

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						be processed on the basis of the necessity for the performance of a task carried out in the public interest by Union institutions and bodies or in the exercise of their official authority [...] Processing of personal data for the performance of tasks carried out in the public interest by the Union institutions and bodies includes the processing of personal data necessary for the management and	created and the biometrics registered on the access badge's internal chip.	is the badge number and the fingerprint minutiae readings in the format of an encrypted series of numbers.	

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						functioning of those institutions and bodies'. 2 - The SRB Facilities team (through the Head of Corporate Services and IT and/or the Local Security Officer (LSO)).			
Business Continuity contact lists /collection of mobile phone numbers	SRB HR, SRB Internal Controller / SRB Facilities	For HR: SRB-HR@srb.europa.eu (For SRB Internal Controller): SRB-INTERNAL-CONTROL-OFFICE@srb.europa.eu u For SRB Facilities: facilities-team@srb.europa.eu	Storage and use contact details in the context of SRB's activities based on SRMR and voluntary consent	SRB staff	Contact details emergency contact details, employment details	SRB HR, SRB Internal Controller / SRB Facilities	As per internal Document Retention Policy	The files containing these data are subject to IT access rights	NO
Staff Committee elections	SRB HR and SRB Staff	SRB-HR@srb.europa.eu	Personal data is collected for the purposes of conducting staff committee elections on the	SRB staff	Name and last name, institutional grade	SRB HR Electoral Committee, SRB staff members	Duration of election process	The files containing these data are subject to IT access rights	NO

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			basis of the Staff regulations						
Access to JSIS functionalities	PMO	PMO functional mailbox	Allow SRB staff having access to online applications without token, i.e. via internet-managed by EC	SRB staff	Contact details, date of birth, sex, personnel nr, bank details. Information provided by staff for reimbursement. Opinions and reports of the JSIS medical service	Paymaster Office (PMO)	The information received from staff members is kept for 7 years	The files containing these data are subject to IT access rights	NO
Medical information of Staff Members	SRB HR	SRB-HR@ srb.europa.eu	According to Staff Regulations Art 28-33; CEOS Art. 12 (2) d)	SRB staff	Administrative Data	SRB HR, European Commission DG HR medical service	SRB: 4 years or longer in case of dispute; Medical service: 30 years after the departure of the staff member	Lockers; Firewalls	NO
Recruitment related processes (Recruitment procedure, offers / grading / establishment of financial rights)	SRB HR	SRB-RECRUITMENT@ srb.europa.eu SRB-INDIVIDUALRIGHTS@ srb.europa.eu	Selection of candidates according to Implementing Rules SRB 25/03/2015 Eligibility checks (SR. Art.33, CEOS, Art.13)	Candidates participating in SRB selection processes Potential candidates not selected for interview	Administrative Data	SRB HR, SRB Selection panel members; PMO; SRB Internal audit;	5 years; in case of offers, grading and establishment of financial rights 8 year after the extinction of all rights of	Lockers; Firewalls;	NO

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			<p>Recruitment procedure (SR, Art.32, CEOS, Art.15)</p> <p>Payment of financial rights (Annex VII of SR)</p>	Successful candidates		HoU of recruiting unit at SRB Chair of SRB; CoA, Ombudsman in case of inquiry	the staff member concerned, but at least 100 years after the recruitment of the person of the candidate		
Implementation of Harassment policy (selection of confidential counsellors; harassment related internal procedures)	SRB HR	<p>Anti-harassment coordinator; Confidential counsellors</p> <p>SRB HR functional mailbox: SRB-HR@ srb.europa.eu</p>	<p>(1) - Selection of confidential counsellors (SR, Art. 12a, 24, 86, 90 & SRB Decision on prevention of harassment</p> <p>(2) - Collection of the personal data as part of the informal procedure (SR, Art. 12a, 24, 86, 90 & SRB Decision on prevention of harassment)</p>	Staff members	Administrative Data	<p>(1)Head of Unit Resources, Members of the selection panel for confidential counsellors, Chair of the SRB</p> <p>(2)Anti-harassment coordinator, Confidential Counsellors; Some data may have to be shared with the Chair of the SRB, other units of the SRB or EU bodies (</p>	<p>(1) 5 years</p> <p>(2) 2 years after the end of the mandate of the appointed Confidential Counsellor.</p> <p>2 years following the unsuccessful conclusion of the selection procedure or unsuccessful completion of the training.</p>	Safe; Lockers; Firewalls; Functional mailbox accessible only to anti-harassment coordinator	NO

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Work patterns of SRB staff (incl. part time, parental/family leave sick leave, annual leave, and other special leave)	SRB.HR	SRB HR functional mailbox: SRB-HR@ srb.europa.eu	EC Decision on absences as a result of sickness or accident, C(2004) 1597 Approval of special leave (EC Decision on leave, C (2013) 9051	Staff members	Administrative	SRB HR, DG HR (medical service)	Between 2 and 5 years, depending on the process	Lockers; Firewalls	NO
Contact points for the activity of the Single Resolution Fund – Contributions Team	SRB Contributions Unit	SRB-Contributions @srb.europa.eu	Processing the collection of ex-ante contributions, administrative contributions, funding and irrevocable payments. Ability to contact the NCAs, ECB, EBA, EC, NRAs and DGSs in order to collect and check the data needed for the calculation of ex-ante contributions. Organization of the Fund Committee Contributions	Staff members of NCAs, NRAs and DGSs2	Contact details	SRB Contributions team	1 year following the moment that the data is no longer required.	The files containing these data are stored on the SRB internal electronic document management system, and in outlook folders subject to SRB IT security.	NO

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Contacts in the process of Investments SRF	Single Resolution Fund- (Investments Team)	SRB-Investments @srb.europa.eu	<p>1) To contact the NRA representatives for assistance with specific matters related to investments.</p> <p>2) To contact the representatives of the outsourcing partners, in relation to the outsourced services of investment management and custody.</p> <p>3) To contact the representatives of the National Central Banks, in relation to the cash account services for the amounts held in the Single Resolution Fund.</p> <p>4) To contact the representatives of benchmark provider, in relation to the provided benchmark services.</p>	<p>1) Representatives of the National Resolution Authorities</p> <p>2) Representatives of the outsourcing partners</p> <p>3) Representatives of National Central Banks</p> <p>4) Representatives of benchmark provider</p> <p>5) Representatives of legal and financial advisor</p> <p>6) Representatives of market participants</p> <p>7) Representative</p>	Contact details	SRB Investments team	In accordance with SRB Document Retention Policy	The files containing these data are subject to IT access rights	NO

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			<p>5) To contact the representatives of legal and financial advisors, in relation to the provided services.</p> <p>6) To contact the representatives of market participants (banks, asset managers, service providers, industry associations) to obtain market information.</p> <p>7) To contact the representatives of data providers, in relation to the provided data services.</p>	es of data provider					
Reimbursement to SRB staff	Finance and all units of SRB	SRB-Finance@srb.europa.eu	<p>1) Simple payment against invoice (Point 14.5 Annex 1 General Financial Regulation)</p> <p>2) Missions expenses (SRB Financial Regulation on implementation of budget)</p>	SRB staff members	Contact details, birth date, copy of ID or passport and bank account	SRB staff members	7 years (Art. 42.5 of SRB Financial Regulation)		NO

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			3) Seconded National Experts and Trainees (SRB Financial Regulation implementation of budget)						
Reimbursement to candidates for a post at SRB	Finance/HR	SRB-Finance@srb.europa.eu	Staff Regulation	Candidates	Candidates' personal identification data; Contact details, birth date, copy of ID or passport and bank account	Candidates	7 years (Art. 42.5 of SRB Financial Regulation)	Limited access rights and restricted in the SRB's internal filing system.	NO
Reimbursement to experts or consultants	SRB Finance Requesting unit at SRB	SRB-Finance@srb.europa.eu	Implementation of budgetary commitment under the SRB Financial Regulation	Expert or consultant under a contract with SRB	Name, personal address, birth date, copy of ID or passport and bank account	SRB Finance team and SRB units involved	7 years (Art. 42.5 of SRB FR)	Limited access rights and restricted in the SRB's internal filing system.	NO
Access to SRB data collection system for Resolution Reporting	Resolution / Reporting units at SRB & IT OPS	IT-OPS IT-OPS@srb.europa.eu	Providing NRAs access to: the SRB's IT solution for data collection for resolution reporting, and to the dedicated webpage on the data collection process (as of May 2019).	NRAs (within and outside the banking union)	Contact details	IT OPS team	Information is deleted upon request of the NRA if user no longer requires access.	Limited access rights to functional mailbox	NO

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Staff Evaluation	Learning and Development function within the Human Resources Team	SRB-LearningandDevelopment@SRB.europa.eu	Ensure the annual evaluation of staff performance	Statutory staff members having already completed their probationary period	Statutory staff member name, statutory staff member self-assessment, qualitative report by the Reporting Officer, report by Appeal Assessor (if applicable)	Selected members of Learning and Development function working on staff evaluation, HR Team Leader, HoU Resources, Reporting Officers (for those reporting to them), Appeal Assessors (if applicable), DG HR (Unit responsible for staff evaluation processes)	In accordance with SRB Document Retention Policy/European Commission Retention List	Subject to sysper access rights	NO

ⁱ All documents under this column may be received by Internal Audit as far as relevant for the exercise of its functions and by the EDPS as far as relevant for the exercise of its functions.

* date of the last update: 1 December 2022