

# Privacy Statement<sup>1</sup> – Integrated Resolution Information System (IRIS)

## 1. Introduction

The Single Resolution Board (SRB) processes your personal data in accordance with Regulation (EU) [2018/1725](#) (EUDPR). The privacy statement explains the reasons for processing your personal data, the way the SRB collects, handles and ensures protection of all personal data. It also specifies the contact details of the responsible SRB unit(s) where you may exercise your rights, the SRB Data Protection Officer and the European Data Protection Supervisor (EDPS).

## 2. Who is responsible for processing your personal data?

The SRB is the controller responsible for the processing of personal data<sup>2</sup>. The SRB unit responsible for the processing of your personal data is the Resolution Planning Office (RPO).

## 3. Why do we process your personal data?

IRIS is the IT application developed by the SRB for resolution planning and oversight activities for significant institutions (SI), cross-border groups (CB LSI) and less significant institutions (LSI) of the participating Member States. It aims to improve:

- The quality and availability of information to support resolution planning, oversight activities and decision making processes;
- The collaboration and real-time exchange of information between a large number of internal and external stakeholders;
- The overall efficiency in the execution of tasks performed during the resolution planning cycle (i.e., document management, planning, communication/notifications, reporting, monitoring, etc.).

The main purposes of the processing of personal data are as follows:

- Support dedicated staff in performing resolution planning and oversight activities;
- Creation of SRB IAM (Identity and Access Management) accounts to grant access to the application;
- Creation of notifications, reports, dashboards and audit logs.

## 4. What is the legal basis for processing your personal data?

The legal basis for processing personal data is Article 5(1)(a) and recital 22 of the Regulation (EU) 2018/1725. The processing is necessary for the performance of tasks carried out in the public interest by the SRB which is to support the management and functioning of the SRB in conjunction with Regulation (EU) No 806/2014, and in particular, but not limited to, Art. 8 (drafting of resolution plans by the Board), Art. 12 (determining MREL by the Board), Art. 28 (Monitoring by the Board), Art. 29 (implementation of decisions under this Regulation), Art. 31 (cooperation within the SRM), and Article 53(1) of the Delegated Regulation (EU) 2016/1075.

## 5. What categories of personal data are processed?

The categories of personal data processed are the following:

**Data in IRIS:** First Name, Last Name, Unit or Institution/Company, Phone, Contact Type and email address of internal and external IRIS users involved in resolution planning and oversight activities.

**Data for Identity and Access Management (i.e., IAM accounts):** Access to IRIS requires the existence of an SRB IAM account, the latter being managed by the SRB in a dedicated system, based on the following credentials: First Name, Last Name and a business email address. For external stakeholders, Phone Number, Contact Type

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<sup>1</sup> Last updated on 25/10/2023.

<sup>2</sup> Please refer to Article 3 (1) of Regulation (EU) 2018/1725 for definition of “personal data”.

and Institution/Company is also required. IRIS collects personal data exclusively to the extent necessary to fulfill the access management requirements. The information will not be re-used for any other incompatible purpose.

**Data for notifications, reports, dashboards and audit logs:** Most attributes within the IRIS system could be used for the production of notifications, reports, dashboards and audit logs.

#### 6. Who has access to your personal data?

When the SRB processes personal data for the aforementioned purposes, the following persons may have access to your personal data, on a strict need-to-know basis:

- Dedicated SRB staff for the performance of their tasks in the context of resolution planning and decision making processes;
- Dedicated SRB staff members for the performance of their tasks in the context of information management systems;
- Dedicated staff of the European Commission, European Banking Authority, European Central Bank, relevant national competent authorities and relevant national resolution authorities for the performance of their tasks in the context of resolution planning and decision making processes;
- Members and observers to Resolution Colleges, Crisis Management Groups, cross-border stability groups and taskforces.
- External Counsel of the SRB and its sub-contractors (e.g., external advisory firms, external consulting firms, etc.) who process personal data on behalf of the SRB and under the instructions of the SRB;
- External auditors.

IRIS will only disclose data to third parties if necessary for the fulfilment of tasks identified above and to the mentioned (categories of) recipients. The SRB will not divulge your personal data for direct-marketing purposes.

#### 7. Is personal data transferred to third countries?

Personal data is not transferred to third countries. The data remains on the SRB infrastructure.

#### 8. How long will the SRB keep your personal data?

The SRB only keeps personal data for the time necessary to fulfil the purpose of resolution planning activities while respecting the retention guidelines applicable under the Records Management Policy at the SRB.

#### 9. What are your data protection rights?

You have the right to access your personal data and correct any data that is inaccurate or incomplete. You also have (with some limitations) the rights to delete your personal data, to restrict or object to the processing of your personal data in line with the relevant provisions of Regulation (EU) 2018/1725.

#### 10. Who can you contact in case of queries or requests?

You can exercise your rights by contacting the Resolution Planning Office at [SRB-IRIS@srb.europa.eu](mailto:SRB-IRIS@srb.europa.eu).

Please contact SRB's Data Protection Officer at [SRB-DPO@srb.europa.eu](mailto:SRB-DPO@srb.europa.eu) for all queries related to your rights under the EUDPR.

#### 11. Addressing the European Data Protection Supervisor

If you consider that your rights under the EUDPR have been violated as a result of the processing of your personal data, you have the right to lodge a complaint with the [European Data Protection Supervisor](https://www.edps.europa.eu/) at any time.