Data Protection Notice

Inter-Executive Agencies Mediators Network

The European Climate, Infrastructure and Environment Executive Agency (CINEA), the European Education and Culture Executive Agency (EACEA), the European Innovation Council and SMEs Executive Agency (EISMEA), the European Research Council Executive Agency (ERCEA), the European Health and Digital Executive Agency (HaDEA) and the European Research Executive Agency (REA) (hereinafter referred to as 'the Executive Agencies') process jointly your personal data[1] in line with Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018[2] on the protection of personal data by the European Union's institutions, bodies and agencies and on the free movement of such data.

1) What is the purpose of the processing activity?

The purpose(s) of this processing activity is the management of individual cases of conflicts at work reported to an appointed Mediator. Specifically, personal data is collected and processed to facilitate the informal settlement, in individual cases, of any difficulties which may arise in working relationships. The Mediators in charge of a specific individual case collect and process personal data also in order to fulfil their preventative role of identifying structural problems and helping resolve them, by making general recommendations to the concerned departments.

This data protection notice covers the processing of personal data under the Inter-Executive Agencies Mediators Network[3] based on the Joint Controllership Agreement signed between the Executive Agencies.

2) Who is the data controller?

The joint data controllers of the processing operation are:

- HaDEA Head of Unit C3 "Staff, Communication and Support" (HaDEA-People-Development@ec.europa.eu);

[1] Personal data shall mean any information relating to an identified or identifiable natural person ('data subject'). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

[2] Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural 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 L295/39 of 21.11.2018).

[3] Selection and appointment of Mediators fall under different data protection notices established separately by each Executive Agency.

- CINEA Head of Unit A.A4 “Communication, People & Workplace” (CINEA-HR-CAREER-DEVELOPMENT@ec.europa.eu);
- EACEA Head of Unit R1 “People, Workplace and Communication” (EACEA-HR@ec.europa.eu);
- EISMEA Head of Department C “Compliance, People and Budget” (EISMEA-MEDIATION@ec.europa.eu);
- ERCEA Head of Unit D.2 “Human Resources” (ERCEA-MEDIATION@ec.europa.eu); and
- REA Head of Unit D.2 “People and Workplace” (REA-Training@ec.europa.eu).

3) Which personal data is collected?

The personal data collected from the data subject mainly relates to the requestor and to other persons concerned by the conflict at work, in particular: identity data, contact information at work (office address, professional telephone number and e-mail address), professional status, roles and tasks at the Agency, name of the Agency at which the person is a staff member, as well as the description of the issue that has led the requestor to consult a Mediator, which could include information on private and professional conduct and performance data.

Moreover, some personal data can fall under the special categories of personal data defined in Article 10(1) of Regulation (EU) 2018/1725. This may include sensitive information, such as data concerning health, sex life or sexual orientation or even racial or ethnic origin, which may be communicated by the parties in the mediation. In case of on-site meeting with the mediator, health related data on accessibility to the office may be processed if necessary.

4) Who has access to the personal data of data subjects and to whom can they be disclosed?

Access to personal data is granted on a need-to know basis to authorised staff responsible for carrying out the processing operation, i.e. to the Coordinators of the Inter-Executive Agencies Mediators Network, Mediator or co-Mediators in charge of the individual request. Such staff abide by confidentiality duties. In some cases, the recipients of the personal data may be the Executive Agencies’ services (e.g. HR) that are competent or involved and must be contacted to settle the case, as well as the staff members involved in the mediation.

The personal data will only be transmitted to them with the consent of the requestor and only to the extent required for the legitimate performance of tasks within the competence of the recipient. The recipients of the personal data have access only to those parts of the file which are necessary to facilitate the resolution of the issue.

However, where urgent action is necessary for the protection of the physical and/or psychological integrity of the requestor or of other persons, the Mediator may, as part of its duty of care, alert the Medical Service, without informing the requestor or the other persons, to ensure that the appropriate health or social care be provided to the requestor or other persons.

In cases where a person requests the assistance of the Mediators for a conflict at work and does not agree that the other party concerned is contacted, the Mediators will not inform the other party of the processing of their personal data in order to preserve the confidentiality of the process. In this situation, an exception to the right to be informed of the other party will be applied in accordance with Article 16 (5) point (d) of Regulation

(EU) 2018/1725 and the applicable Agencies' Steering Committee decisions laying down internal rules concerning the restriction of certain rights under Article 25 of Regulation (EU) 2018/1725 [4].

Corporate and third-party IT tools, such as Microsoft 365 applications, may be used in the context of this processing activity. This would entail that the parties will transmit personal data through these IT systems. Such transmission shall take place in compliance with the agreed purposes. In this respect, DG DIGIT will act as the processor and may also receive personal data, together with its contractor, Microsoft. For more information, you can refer to the relevant Commission's Privacy Statement.

The personal data collected on individuals seeking the assistance of a Mediator will not be disclosed to any third party except to the extent and for the purpose that may be required by law.

In the event of facts which give rise to the presumption of existence of possible illegal activity, including fraud or corruption, detrimental to the interests of the Union, or of conduct relating to the discharge of professional duties which may constitute a serious failure to comply with the obligations of officials of the Union, the Mediator may deem it necessary to report it to the relevant manager of the person concerned, or the European Anti-Fraud Office (OLAF) or the Investigation and Disciplinary Office (IDOC).

In addition, personal data may be disclosed to public authorities in accordance with Union and Member State law such as the European Court of Justice, the relevant national judge as well as the lawyers and the agents of the parties in case of legal proceedings, the competent Appointing Authority in case of a request or a complaint lodged under Articles 90 of the Staff Regulations, the Internal Audit Service of the Commission (IAS), the Court of Auditors, the European Ombudsman, the European Data Protection Supervisor (EDPS) and the European Public Prosecutor's Office (EPPO).

Your personal data **will not be transferred** to third countries or international organisations.

The processing of your personal data **will not include automated decision-making** (such as profiling).

5) Which is the legal basis for processing your personal data?

Lawfulness of the processing: The provision of internal mediation services in Executive Agencies is in line with the Inter-Executive Agencies Human Resources Strategy[5], the Memorandum of Understanding laying down the Inter-Executive Agencies Mediators Network[6] and the common Manual of Procedures laying down the rules of procedures for the functioning of this Inter-Executive Agencies Network.

The processing operations of personal data are based on:

[4] Decision of the CINEA Steering Committee is available here (OJ L 45, 9.2.2021).
Decision of the EACEA Steering Committee is available here (OJ L 92, 17.3.2021).
Decision of the HaDEA Steering Committee is available here (OJ L 379, 26.10.2021).
Decision of the EISMEA Steering Committee is available here (OJ L 26, 26.1.2021).
Decision of the REA Steering Committee is available here (OJ L 198, 4.6.2021).
Decision of the ERCEA Steering Committee is available here (OJ L 144, 27.4.2021).
[5] Ares (2023) 1517267 of 2 March 2023.
[6] Ares (2025) 6479114 of 8 August 2025.

- Article 5(1)(a) of Regulation (EU) 2018/1725, according to which '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' and more specifically, for the management and functioning of the Union Institutions or bodies[7] (Recital 22 of Regulation (EU) 2018/1725).

In addition, the processing can be based on the following legal bases:

- Consent under Article 5(1)(d) of Regulation (EU) 2018/1725 before the Mediators send the personal data provided by the requestor to other persons, unless otherwise required by EU law.
- Article 10(2)(a) of Regulation (EU) 2018/1725: the prior and explicit consent of the requestor is also required when the personal data being processed falls under the special categories of personal data referred to in Article 10(1) of the Regulation (for example racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation).
- Article 10(2)(h) of Regulation (EU) 2018/1725 in cases where urgent action is necessary for the protection of the physical and psychological integrity of the persons concerned in cases where urgent action is necessary.

6) How long do we keep your personal data?

A maximum of 2 calendar years after the closure of the case will apply for the record of the case ("requestor's file"), including information about the requestor, the requestor's original and closure requests and the summaries of the assistance provided, unless there would be a need to keep it for longer, e.g. re-opening of the mediation, a judicial dispute/court proceedings has been launched which requires the access to the file. In case a different procedure is launched (e.g. court proceedings, OLAF case, IDOC case, etc), the processing of personal data will be covered under the relevant specific data protection record and would no longer fall under the mediation process.

All electronic communications with the requestor and other persons or services involved, with the exception of the original and closure requests, will be deleted on the closure of the case.

7) How do we protect and safeguard your personal data?

[7]Council Regulation (EC) No 58/2003 of 19 December 2002, laying down the Statute for executive agencies to be entrusted with certain tasks in the management of EU programmes;
Commission Implementing Decision (EU) 2021/173 of 12 February 2021 stablishing the establishing the European Climate, Infrastructure and Environment Executive Agency, the European Health and Digital Executive Agency, the European Research Executive Agency, the European Innovation Council and SMEs Executive Agency, the European Research Council Executive Agency, and the European Education and Culture Executive Agency and repealing Implementing Decisions 2013/801/EU, 2013/771/EU, 2013/778/EU, 2013/779/EU, 2013/776/EU and 2013/770/EU;
Regulation No 31 (EEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community.

Relevant organisational and technical measures are taken by each Executive Agency to ensure the security of your personal data.

Technical measures include appropriate actions to address online security, risk of personal data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed.

Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need-to-know for the purposes of this processing operation. Access to your personal data is granted via an authentication system on an individual basis through user-ID and password. Your personal data resides on the servers of the European Commission (EC), which abide by strict security measures implemented by the European Commission (DG DIGIT) and by each Executive Agency, to protect the security and integrity of the relevant electronic assets. The joint data controllers are bound by Commission Decision 2017/46 of 10 January 2017 on the security of communications and information systems in the EC.

8) What are your rights regarding your personal data?

Under the provisions of the Regulation (EU) 2018/1725, you have the following rights:

- to request to the joint controller to access the personal data that it holds about you;
- to have your personal data rectified in case your personal data are inaccurate or incomplete;
- to request the erasure of your personal data, when applicable;
- to request the restriction of the processing of your personal data, when appropriate.

You are also entitled to object to the processing of your personal data on grounds relating to your particular situation at any time unless the (joint) controllers demonstrates compelling and overriding legitimate grounds or in case of legal claims.

If processing is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on your consent before its withdrawal.

Your request to exercise one of the above rights will be dealt with without undue delay and within **one month**. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

In order to ensure that the Inter-Executive Agencies Mediators Network effectively carries out its independent tasks of providing informal confidential advice, while ensuring full respect for the fundamental rights and freedoms of other data subjects, it may be necessary to apply a restriction to rights of the persons concerned by the mediation (in particular to their right of information, access to personal data, right of erasure, right to restriction of processing, right to receive communication of a personal data breach affecting them and confidentiality of electronic communications) based on the applicable Agencies' Steering Committee decisions laying down internal rules concerning the restriction of certain rights under Article 25 of Regulation (EU) 2018/1725 (as indicated above).

In all cases where a restriction is imposed, the restriction will continue to apply as long as the reasons justifying it remain applicable. The need to maintain any restriction will be

monitored every 6 months. The restriction will be lifted as soon as the circumstances justifying the restriction are no longer applicable. In principle, you will be informed on the principal reasons for a restriction unless this information may cancel the effect of the restriction.

9) Contact Information

If you have **any queries** concerning the processing of your personal data, you may contact the Data Controller of the Mediator dealing with your case, as indicated in point 2.

You shall have the right of **recourse** at any time to the Data Protection Officer of your Agency at the following e-mail address:
HADEA-DPO@ec.europa.eu;
CINEA-DPO@ec.europa.eu;
EACEA-data-protection@ec.europa.eu;
EISMEA-DPO@ec.europa.eu.eu;
ERC-DATA-PROTECTION@ec.europa.eu;
REA-DATA-PROTECTION-OFFICER@ec.europa.eu.

You may lodge a complaint with the European Data Protection Supervisor: http://www.edps.europa.eu.

Electronically signed on 22/05/2026 11:46 (UTC+02) in accordance with Article 11 of Commission Decision (EU) 2021/2121