Ref. Ares(2026)8172041 - 26/08/2026

EUROPEAN HEALTH AND DIGITAL EXECUTIVE AGENCY (HADEA)

Record No: HR.10 **Initial approval by Data Controller**: ARES registration date

Update (s) *(if applicable):* N/A

NAME OF THE PROCESSING ACTIVITY

Inter-Executive Agencies Mediators Network and Selection procedure and appointment of HaDEA Mediators

IDENTIFICATION OF THE DATA CONTROLLER

As regards the mediators network: Joint controllers: European Health and Digital Executive Agency (HaDEA), Head of Unit C.3 Staff, Communication and Support; European Climate, Infrastructure and Environment Executive Agency (CINEA), Head of Unit A.4 Communication, People and Workplace; European Education and Culture Executive Agency (EACEA), Head of Unit R.1 People, Workplace and Communication; European Innovation Council and SMEs Executive Agency (EISMEA), Head of Department C Compliance, People and Budget; European Research Council Executive Agency (ERCEA), Head of Unit D.2 Human Resources; European Research Executive Agency (REA), Head of Unit D.2 People and Workplace.
As regards to the selection of Mediators: HaDEA Head of Unit C.3 “Staff, Communication and Support”.

GROUND FOR THIS RECORD

x Record of a new type of processing activity of personal data (before its implementation)
□ Record of a processing activity of personal data that is already in place
□ Change/Amendment/ Update of an already existing previous record

1. INFORMATION ON THE PROCESSING ACTIVITY

OF INTER-EXECUTIVE AGENCIES MEDIATORS NETWROK

This processing activity is performed in accordance with **Regulation (EU) No 2018/1725** ([1]) on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

1.1 The Data Controllers are**:**

For the Mediators Network:

- for HaDEA: Head of Unit C.3 Staff, Communication and Support who can be contacted at HADEA-PEOPLE-DEVELOPMENT@ec.europa.eu
- for CINEA: Head of Unit A.4, Communication, People and Workplace who can be contacted at CINEA-HR-CAREER-DEVELOPMENT@ec.europa.eu
- for EACEA: Head of Unit R.1 People, Workplace and Communication who can be contacted at EACEA-HR@ec.europa.eu
- for EISMEA: Head of Department C Compliance, People and Budget who can be contacted at: EISMEA-MEDIATION @ec.europa.eu.
- for ERCEA: Head of Unit D.2 Human Resources who can be contacted at ERCEA-MEDIATION@ec.europa.eu
- for REA: Head of Unit D.2 People and Workplace who can be contacted at REA-TRAINING@ec.europa.eu

For the selection procedure and appointment:

The Head of Unit C.3 Staff, Communication and Support European Health and Digital Executive Agency (HaDEA), who can be contacted at HADEA-PEOPLE-DEVELOPMENT@ec.europa.eu

1.2 The contact details of the Data Protection Officer (DPO)

For the Mediators Network:

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.

For the selection procedure and appointment:

HADEA-DPO@ec.europa.eu

([1]) 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 L 295/39 of 21.11.2018).

1.3 Controller:

See point 1.1

1.4 The following entity(ies) is/are acting as Processor(s):

N/A

1.5 Description and purpose(s) of this processing:

The purpose(s) of this processing activity is on the one hand the management of individual cases of conflicts at work 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 Mediator in charge of a specific individual case collects and process personal also in order to fulfil their preventative role of identifying structural problems and helping resolve them, by making general recommendations to the concerned departments.

On the other hand, it is to select and appoint HaDEA staff members who will serve as the HaDEA Mediators and join the Inter-Agency Mediation Network, further to the signature of the Memorandum of Understanding ([2]) establishing the Inter-Executive Agencies Mediators' Network on 8 August 2025.

1.6 The legal basis for the processing based on Article 5(1) of Regulation (EU) 2018/1725 is/are:

- ☒ **(a)** the 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 laid down in Union law;
- ☒ **(a2**) the processing is necessary for the **management and functioning** of the Union Institutions, bodies or agencies (Recital (22) of Regulation (EU) 2018/1725) laid down in Union law;
- ☐ **(b)** the processing is necessary for **compliance with a legal obligation** to which the controller is subject, which are laid down in Union law;
- ☐ **(c**) the processing is necessary for the **performance of a contract** to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- ☒ **(d)** the data subject has given **consent** to the processing of his or her personal data for one or more specific purposes;
- ☐ **(e**) the processing is necessary in order to protect the **vital interests** of the data subject or of another natural person.

([2]) Ares(2025)6479114

The provision of internal mediation services in Executive Agencies is in line with the Inter-Executive Agencies Human Resources Strategy ([3]), the Joint Controllership Arrangement ([4]), the Memorandum of Understanding laying down the Inter-Executive Agencies Mediators Network ([5]) and the common Manual of Procedures laying down the rules of procedures for the functioning of this Inter-Executive Agencies Network ([6])

Moreover, in accordance with 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 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), and 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.

1.7 The categories of data subjects

☒ Agency staff (Contractual and temporary staff in active position)

☐ Applicants

☐ Relatives of the data subject

☐ Complainants, correspondents and enquirers

☐ Witnesses

☐ Beneficiaries

☐ External experts

☒ Contractors

☒Other, please specify: Staff from Executive Agencies requesting mediation services; national experts seconded to Executive Agencies; trainees; persons employed by Executive Agencies under contracts concluded under national law; staff from service providers.

1.8 Categories of personal data

([3]) Ares (2023) 1517267 of 2 March 2023.
([4]) Ares(2026)5197847
([5]) Ares (2025) 6479114 of 8 August 2025.
([6]) Ares(2025)11431177.

a) Categories of personal data:

As regards the mediators network: 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 (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.

As regards the selection of Mediators: HaDEA collects and processes the following types of personal data during this processing operation:

- Identification data of the members of the selection committee (selected by the HaDEA People Sector or appointed by the Director): name, surname and e-mail address.
- Identification data of the candidates to become Mediator: Name, surname, professional address and e-mail address, personnel number.

- Data concerning the candidate's career, recruitment and contract: type of contract, grade, status.

- CV, motivation letter and any relevant evidence of previous activities and diploma in the relevant field.

- Data being used to evaluate personal aspects of the candidates (ability, efficiency, conduct):
  - Assessment by the selection committee on the suitability and performance of the candidates based on application files and the interview.
  - The candidates shall provide a declaration of honour (solemn declaration) about their disciplinary situation as reported in their personal file (including also whether they are subject to an administrative inquiry) during their career within the EU institutions and bodies.

  The following data will also be published on the common intranet/sharepoint:

  - name of the Mediator(s),
  - a photo,
  - the languages spoken,
  - their motivation to become a Mediator and their professional background.

b) Categories of personal data processing likely to present <u>specific risks:</u>

N/A

c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):
Some 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.

d) Specify any additional data or explanatory information on the data being processed, if any:
N/A

1.9 Retention period (maximum time limit for keeping the personal data)

Regarding the Mediators Network:

- A 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. The file will be destroyed after a maximum of 2 calendar years have elapsed after the closure of the case.
- 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.

Regarding the Selection procedure and appointment of HaDEA Mediators:

- Documents that have been provided by candidates will be retained for two years after the appointment decision and will be deleted at the end of this period.
- Personal data published on the centralised page will be kept for as long as the Mediators occupy their position.

Is any further processing for historical, statistical or scientific purposes envisaged?
☐ yes, ☒ no

1.10 The recipient(s) of the data

Regarding the Mediators Network:

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-Mediator in charge of the individual request. Such staff abide by confidentiality agreements. In some cases, the recipients of the data may be the Executive Agencies' services (such as 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 ([7]).

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

([7]) 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)

relevant manager of the person concerned, or the European Anti-Fraud Office (OLAF) or the Investigation and Disciplinary Office (IDOC).

Regarding the Selection procedure and appointment of HaDEA Mediators:

The persons with access to personal data, on a need-to-know basis, are:

- The Director of the Agency;
- Members of the Selection Committee;
- Authorised members of the HaDEA People Sector (such as (Deputy) Head of Unit, Head of Sector and authorised staff responsible for 'Staff Development').

Successful candidates as Mediators must participate in a certification training before they can be appointed. Therefore, trainers might have access to personal data of Mediators' in the context of this training.

The final list of Mediators appointed by the Director will be published on a centralised page accessible from all Executive Agencies ([8]) and any person having access to the common Intranet/sharepoint, ensuring transparency and easy access. The HaDEA People Sector will also send a notification letter to the line manager(s) of the Mediator(s) to inform them of the appointment(s) and any practical implications associated with the new responsibilities.

In addition, in case of control or dispute, personal data can be shared with and processed by the bodies charged with a monitoring or inspection task in application of Union law in compliance with the applicable data protection rules and within the scope of their tasks entrusted by the relevant legislation.
This includes, in particular, the following recipients:
• Bodies in charge of a monitoring or an inspection task in application of Union law (e.g. internal audit, IAS, Court of Auditors, etc.);
• The European Court of Justice or a national judge as well as the lawyers and the agents of the parties in case of a legal procedure;
• OLAF in case of an investigation conducted in application of Regulation (EC) No 1073/1999;
• The European Ombudsman within the scope of the tasks entrusted to it by Article 228 of the Treaty on the Functioning of the European Union;
• The European Data Protection Supervisor in accordance with Article 58 of Regulation (EC) 2018/1725;
• The European Public Prosecutor's Office within the scope of Article 4 of Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office.

1.11 Transfers of personal data to third countries or international organisations

([8]) The names of the Mediators appointed by each Executive Agency will be published with a short description of their profile (e.g. spoken languages, status and category).

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

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

1.13 Description of security measures

The following technical and organisational security measures are in place to safeguard the processing of this personal data:
The European Commission's IT systems used by the Agency abide by the Commission's security guidelines. The Agency complies with Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

1. Organisational measures:
A Corporate Local Informatics Security Officer (C-LISO) is in place. Its role includes supervising the Agency compliance with the relevant regulations, and the application of security measures recommend by DIGIT.
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 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.

2. 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.

1.14 Data protection Notice

Data Subjects are informed on the processing of their personal data via a **data protection notice on their rights:**
- to access their personal data held by a controller;
- to request their personal data held by a controller to be corrected;
- to obtain in some situations erasure of their personal data held by a controller, e.g. when data are held unlawfully (right to be forgotten);
- to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- **of recourse** at any time to the **relevant Data Protection Officer** (see point1.2) and to the **European Data Protection Supervisor** at https://edps.europa.eu.

Specifically, as regards the Mediators Network, a Joint Data Protection Notice is in place and can be consulted here. Concerning the selection of Mediators, the relevant Data Protection Notice is available on HaDEA's website.

Request from a data subject to exercise a right will be dealt 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 Networkeffectively carries out its 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' decisions laying down internal rules concerning the provision of information to data subjects and the restriction of certain rights under Article 25 of Regulation (EU) 2018/1725.

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.

Electronically signed on 26/08/2026 10:12 (UTC+02) in accordance with Article 11 of Commission Decision (EU) 2021/2121