



EMA/671394/2019

## Record of data processing activity for reporting fraud and irregularities (public)

1.	Last update of this record, version number:	9 December 2019, version 1
2.	Reference number:	ED1
3.	Name and contact details of controller:	European Medicines Agency Internal contact: Executive Director Contact: <a href="mailto:afo@ema.europa.eu">afo@ema.europa.eu</a>
4.	Name and contact details of DPO:	<a href="mailto:dataprotection@ema.europa.eu">dataprotection@ema.europa.eu</a>
5.	Name and contact details of joint controller (where applicable)	Not applicable
6.	Name and contact details of processor (where applicable)	Not applicable
7.	Purpose of the processing	The purpose of the processing of the personal data by the EMA Anti-Fraud Office of reported information regarding irregularities and potential fraud cases that are brought to its attention by way of reported information (internal or external whistle blowing) or that have reached the Agency by other means. This process will allow gathering information on the reported conduct in order to assess and identify which cases require to be transmitted to the European Anti-Fraud Office according to Article 8 of Regulation (EU, Euratom) No. 883/2013.
8.	Description of categories of persons whose data EMA processes and list of data categories	EMA staff members, members of EMA Management Board, members of scientific committees and working parties, experts working on behalf of EMA, trainees, interims, seconded national experts, contractors, consultants, persons referred to in the fraud reporting process.  The data categories to be processed varies depending on the nature of the suspected fraud or irregularity reported, however

**Official address** Domenico Scarlattilaan 6 • 1083 HS Amsterdam • The Netherlands

**Address for visits and deliveries** Refer to [www.ema.europa.eu/how-to-find-us](http://www.ema.europa.eu/how-to-find-us)

**Send us a question** Go to [www.ema.europa.eu/contact](http://www.ema.europa.eu/contact) **Telephone** +31 (0)88 781 6000

An agency of the European Union



		not exhausting examples of these data categories are the following: data concerning suspected offences, offences, criminal offences or security measures (e.g. police certificates); data concerning leave and absences; data concerning the data subject's family; data concerning the data subject's private sphere; data concerning pay, allowances and bank accounts; data concerning recruitment and contracts; data concerning missions and journeys; data concerning social security and pensions; data concerning medical benefits and expenses; data concerning telephone numbers and communications.
9.	Time limit for keeping the data	For cases that <u>are not</u> notified to the European Anti-Fraud Office (OLAF) and for which no further action is needed, the retention period of the data is 3 years.  Retention periods for cases that <u>are notified</u> to the European Anti-Fraud Office are aligned with those of OLAF, as follows: 15 years: data on a case with follow up 8 years: data in a case without follow up 5 years data: data in a case that has been dismissed  All retention periods commence after the case has been closed.  Improper and pointless messages will be deleted immediately.
10.	Recipients of the data	The recipients of the data will be identified on a need to know basis, but can include the Executive Director, the EMA Anti-Fraud Office, Head of Audit, HR officers, EMA management involved in the specific case or EMA HR management, investigators appointed to undertake administrative inquiries, European Anti-Fraud Office, Disciplinary Board members
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No
12.	General description of security measures, where possible.	All areas of the EMA building have electronic card access control in line with EMA security procedures. All computer equipment is password controlled. Network firewalls protect the logic perimeter of the EMA IT infrastructure. EMA's main security systems are security hardened.  The EMA documents and access thereto is subject the EMA's Document Classification Policy.  Documents pertaining to potential frauds are stored in secure locations and accessible only by the Anti-Fraud Officer and staff members specifically delegated by him/her.  The functional mailbox of the Anti-Fraud Officer <a href="mailto:afo@ema.europa.eu">afo@ema.europa.eu</a> , where the potential cases of fraud may be reported, is accessible only by the Anti-Fraud Officer and by staff members specifically delegated by him. This mailbox has restrictions for the deletion of data or communication of such data. A specific fraud register/database is password protected and is accessible only by the Anti-Fraud Officer and by staff members specifically delegated by him/her.
13.	For more information, including how to exercise your rights to access,	In certain circumstances the <a href="#">Decision of the Management Board of the European Medicines Agency of 12 June 2019 on internal rules concerning restrictions of certain rights of data</a>

	<p>rectification, object and data portability (where applicable), see the privacy statement:</p>	<p><a href="#">subjects in relation to processing of personal data in the framework of the functioning of the Agency</a> may be applicable to the handling of reports regarding irregularities and potential fraud cases.</p> <p>Details concerning the processing of your personal data are available on the Agency's website at: <a href="https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement">https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement</a>, where you may find the EMA General Privacy Statement as well as the privacy statements on specific data processing operations.</p>
--	--	--