

Privacy statement - Declarations of Interest

The ECHA Procedure for Prevention and Management of potential Conflicts of Interest foresees that all individuals working for the Agency shall declare any interests which could be considered to be prejudicial to their independence. As a consequence a lot of personal data needs to be provided to the Agency. Below you will find more information about the processing and the Data Protection safeguards put in place by the Agency to make sure any processing of your personal data is in line with Regulation (EU) 2018/1725 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.

What is the purpose and legal basis for processing your personal data?

Any personal data shall be collected and processed solely for detecting potential conflicts between the private interests held by the individuals working for the Agency and the duty of the Agency to make impartial and objective decisions, opinions and recommendations.

For the Executive Director and for members of the ECHA bodies (Management Board, Committees, Forum and the Board of Appeal), the legal basis for processing personal data contained in the declarations of interests is foreseen in Articles 87, 88 and 90 of the REACH Regulation, while for the staff of the Agency, Articles 11-17 of the Staff Regulations lie at the basis of this obligation. For both groups, as well as for any other individual working for the Agency, reference can also be made to the Management Board decision adopting the Procedure for Prevention and Management of potential Conflicts of Interests (PRO-0067).

What personal data is collected?

Name and position in the ECHA organisation and private interests held, or entrusted to, the individuals working for the Agency, including those of their close family members (spouse, partner and/or dependent children, as well as other relatives under the care of the members of the household).

Who has access to your personal data and to whom is it disclosed?

For transparency purposes the declarations of interest of the main actors behind ECHA's decision- and opinion-making are made available to the general public. The declarations of the members of the ECHA bodies, of the expert groups and of the ECHA management staff are published on the ECHA website.

The declarations of interest submitted by the ECHA staff are stored in an electronic register, managed by the Human Resources (HR) Unit, and to which the process owners (and possible delegates) and line managers of the staff concerned have access. This allows the managers to make an informed decision when assigning tasks to the staff under their supervision.

If the specific case warrants it, the Executive Director may decide to consult the Conflicts of Interest Advisory Committee to advise on how to handle a potential conflict of interest.

Furthermore, declarations may be transferred to bodies in charge of a monitoring or inspection task in conformity with Community law, including the European Court of Auditors, the Internal Audit Service, the Internal Audit Capability, OLAF, the European Ombudsman and the European Data Protection Supervisor.

Who is the data controller?

With regard to the ECHA bodies, the respective secretariat shall exercise the tasks of the data controller. For what the ECHA staff is concerned, it shall be the Head of the Human Resources Unit who is the controller.

How long are your personal data kept?

The declarations of interest submitted by the members of the ECHA bodies and by the ECHA staff members are entered into a register kept by the respective secretariats. As annual renewal of these declarations is required, old declarations are removed from the above mentioned register, but stored and archived by the secretariats for auditing purposes for a maximum period of 5 years after the discharge for the budgetary year to which the declaration relates, after which they are destroyed.

What are your rights?

Anyone submitting personal data to the Agency has the right to access it and to update or correct it at any time. Under certain conditions, a right to erasure, restriction, objection and/or data portability also applies.

To exercise the above mentioned rights, you can contact ECHA via the [contact form](#) on ECHA's website. Please use the phrase "Exercising Data Protection rights" in the heading.

When experiencing difficulties in exercising these rights, you can contact ECHA's Data Protection Officer (data-protection-officer@echa.europa.eu) or have recourse to the European Data Protection Supervisor.