

Data protection notice on procedures for cases of harassment

Last updated: 6 June 2025

The European Institute for Gender Equality (EIGE) is committed to protect your personal data and to respect your privacy. EIGE collects and further processes personal data pursuant to [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 (repealing Regulation (EC) No 45/2001).

You will find information in this document pertaining to the processing of your personal data by EIGE. If, upon reading it, you still have questions, please contact us at:

EIGE's Data Protection Officer, dpo@eige.europa.eu

EIGE's HR, EIGE.HR@eige.europa.eu

Purpose of processing

Personal data are processed for purpose of conducting both the formal and informal procedures as laid down in the Decision of the Management Board of EIGE on the policy protecting the dignity of the person and preventing psychological and sexual harassment, and in the Manual of Informal Procedures within the framework of EIGE's policy on protecting the dignity of the person and preventing psychological and sexual harassment.

Your personal data will not be used for any automated decision-making including profiling.

Legal basis of processing

Processing is necessary to comply with legal obligations EIGE is subject¹, namely those arising from:

- Article 1d, 12(a), 24, 86 and 90 of the [Staff Regulations](#);
- Articles 11 and 81 of the [Conditions of Employment of Other Servants](#); and
- Decision of the Management Board of EIGE on the policy protecting the dignity of the person and preventing psychological and sexual harassment².

¹ Processing is, therefore, justified under Articles 5(1)(b) Regulation 2018/1725.

² Management Board Decision of 06/06/2012, applicable by analogy Commission Decision C(2012) 1931



An EU Agency

Types of personal data collected

The following personal data may be processed:

a) 'Hard data' (i.e., administrative data) which may include:

- Identification data of the victim, of the alleged harasser (only upon the consent of the victim) and of possible witnesses: last name, first name, gender, unit and function group (incl. hierarchical link);
- Categorisation of the problem/conflict/situation;
- Types of intervention/action foreseen or taken; and
- History of transfers.

b) 'Soft data' (declarations and allegations made), which may include special categories of personal data³:

- Notes taken by the confidential counsellors;
- Declarations from witnesses; and
- Any kind of supporting documentation provided by the victim.

Individuals who have access to the data

Access to your personal data may be given on a need-to-know basis to the following categories of recipients:

- Director;
- Confidential Counsellors;
- Head of Unit / Line manager;
- HR Team members;
- External experts (medical officer, psychologists, emergency services) only in exceptional and emergency cases (serious risk to the health or safety of the victim) preferably with the victim addressing directly the third party;
- Investigation team members; and
- Where the facts lead to the lodging of a court case, access to personal data will be given to EIGE's external lawyers, national courts and/or the Court of Justice of the European Union.

No other third parties will have access to your personal data, except if required by law.

No transfers of personal data to third countries or international organisations (outside the EU/EEA) take place.

Retention policy

The following retention periods will apply:

³ As defined under Article 10(1) of Regulation 2018/1725: *personal data revealing 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.*

- If the alleged harasser / perpetrator has not been informed of the existence of an informal procedure, no data relating to that person are kept in the archives of Human Resources when the case is closed;
- Files held by the HR and relating to informal procedures (opening and closing forms together with the case file, if any) are kept for a maximum period of three months from the date of the last document added to the file;
- Files held by HR as well as annexes related to both informal and formal procedures are kept for a maximum period of five years unless there is a judicial or administrative procedure requiring that this documentation is consulted, in which case the files will be kept until all applicable appeal deadlines expire; and
- Anonymous data are collected only for statistical purposes in the anonymous statistical form to be filled in by the confidential counsellors at the end of the informal procedure.

Security of your personal data

Electronic documents sent to HR or to the Confidential Counsellors are kept in a secured environment (i.e., restricted access protected by password) or on an encrypted disk which is not accessible to third parties. Paper version of the documents are kept in locked cupboards or in a safe.

Your rights as data subject

Within the limits set by Regulation (EU) 2018/1725, you have the right to access, rectify, erase and/or port your personal data, as well as to restrict or object to the processing of your personal data.

In order to exercise your rights, please contact EIGE.HR@eige.europa.eu whereby you shall specify your claim (i.e. the right(s) you wish to exercise). The exercise of your rights is free of charge. If your request is manifestly unfounded or excessive, EIGE may refuse to act on it.

Restriction of data protection rights

Pursuant to the Decision no. 253 on Internal rules concerning restrictions of certain rights of data subjects in relation to the processing of personal data in the framework of the functioning of EIGE⁴, during the investigation of the alleged harassment situation the following data protection rights may be restricted:

- right of information to be provided to the data subject;
- right of access;
- right of rectification, erasure of personal data and right of restriction to the processing of personal data; and
- right to be communicated of the occurrence of a personal data breach and right of the confidentiality of electronic communications.

⁴ As adopted of 28 June 2022; ref. EIGE/CS/iv D/2022/357.

Other rights

Should you feel that the processing infringes the data protection rules, you are entitled to raise a [complaint](#) with the European Data Protection Supervisor.