

Data protection statement on the processing of professional personal data within the framework of creating and maintaining a list of contacts to support depository and extended custody services from financial institutions

Protecting your privacy is of the utmost importance to the European Patent Office (EPO). We are committed to protecting your personal data and ensuring respect for data subjects' rights when performing our tasks and providing our services. All data of a personal nature that identify you directly or indirectly will be processed lawfully, fairly and with due care.

The processing operations described below are subject to the EPO Data Protection Rules ([DPR](#)).

The information in this statement is provided in accordance with Articles 16 and 17 DPR.

1. What is the nature and purpose of the processing operation?

The EPO's Principal Directorate (PD) Administration of the Reserve Funds has appointed multiple financial institutions to provide cash depository services (current accounts and term deposits) and one financial institution to provide cash depository and extended custody services, including settlement and safekeeping of securities, tax reclaim services and performance calculation services for assets owned by the European Patent Organisation.

This data protection statement relates to the processing of a list of contacts employed and provided by the financial institutions for that purpose.

Personal data of the service providers' employees are processed for the purpose of the depository services as well as the general custody, settlement, tax reclaim, performance reporting and other services as outlined within the contractual framework on behalf of the European Patent Organisation.

The professional personal data are processed within the EPO's email application. The data protection statement on email usage therefore applies:

https://link.epo.org/web/data_protection_statement_email_usage_en.pdf

The processing is not intended to be used for any automated decision-making, including profiling.

Your personal data will not be transferred to recipients outside the EPO which are not covered by Article 8(1), (2) and (5) DPR unless an adequate level of protection is ensured. In the absence of an adequate level of protection, a transfer can only take place if appropriate safeguards have been put in place and enforceable data subject rights and effective legal remedies for data subjects are available, or if derogations for specific situations as per Article 10 DPR apply.

2. What personal data do we process?

The following categories of personal data are processed: name and surname, company position or area of responsibility, professional email address and professional telephone number.

3. Who is responsible for processing the data?

Personal data are processed under the responsibility of the Principal Director Administration of the Reserve Funds, acting as the EPO's delegated data controller.

Personal data are processed for operational purposes by the EPO staff working in PD Administration of the Reserve Funds.

In exceptional cases personal data might be shared with the EPO's legal department for due diligence purposes and potential litigation or conflict handling.

4. Who has access to your personal data and to whom are they disclosed?

Personal data are disclosed on a need-to-know basis to the EPO staff working in PD Administration of the Reserve Funds.

In exceptional cases, personal data might be shared with the EPO's legal department for due diligence purposes and potential litigation or conflict handling.

Personal data will only be shared with authorised persons responsible for the necessary processing operations. They will not be used for any other purposes or disclosed to any other recipients.

5. How do we protect and safeguard your personal data?

We take appropriate technical and organisational measures to safeguard and protect your personal data from accidental or unlawful destruction, loss or alteration and unauthorised disclosure or access.

All personal data are stored in secure IT applications in accordance with the EPO's security standards. Appropriate levels of access are granted individually only to the above-mentioned recipients.

For systems hosted on EPO premises, the following basic security measures generally apply:

- user authentication and access control (e.g. role-based access control to the systems and network, principles of need-to-know and least privilege)
- logical security hardening of systems, equipment and network
- physical protection: EPO access controls, additional access controls to datacentre, policies on locking offices
- transmission and input controls (e.g. audit logging, systems and network monitoring)
- security incident response: 24/7 monitoring for incidents, on-call security expert

6. How can you access, rectify and receive your data, request that your data be erased, or restrict/object to processing? Can your rights be restricted?

You have the right to access, rectify and receive your personal data, not to be subject to a decision based solely on automated processing, to have your data erased and to restrict and/or object to the processing of your data (Articles 18 to 24 DPR).

If you would like to exercise any of these rights, please write to the Data Protection Officer at DPOexternalusers@epo.org.

In order to enable us to respond more promptly and precisely, you always need to provide certain preliminary information with your request. We therefore encourage you to fill in this [form](#) and submit it with your request.

We will reply to your request without undue delay and in any event within one month of receipt of the request. However, Article 15(2) DPR provides that this period may be extended by two further months where necessary in view of the complexity and number of requests received. We will inform you of any such delay.

7. What is the legal basis for processing your data?

Personal data are processed on the basis of Article 5(a) DPR (processing is necessary for the performance of a task carried out in the exercise of the official activities of the European Patent Organisation or in the legitimate exercise of the official authority vested in the controller, which includes the processing necessary for the Office's management and functioning) or Article 5(b) DPR (processing is necessary for compliance with a legal obligation to which the controller is subject).

8. How long do we keep your data?

Personal data will be kept only for the time needed to achieve the purposes for which it is processed.

The existing contact list is overwritten each time an update is received. Historic data is not stored or archived.

Personal data will be deleted after termination of the contract and the overall retention period runs until the end of the contract with the service provider.

In the event of a formal appeal/litigation, all data held at the time the formal appeal/litigation was initiated will be retained until the proceedings have been closed.

9. Contact information

If you have any questions about the processing of your personal data, you can also contact our Data Protection Officer at DPOexternalusers@epo.org.

10. Review and legal redress

If you consider that the processing infringes your rights as a data subject, you have the right to request review by the controller under Article 49 DPR and, if you disagree with the outcome of the review, the right to seek legal redress under Article 50 DPR.