

| Processing activity | | | | |
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| Purpose of processing | | Categories of pesonal data | Retention period | Destruction |
| 1. Human Resources | | | | |
| 1.1 | Recruitment process | CV, application letter | Not Applicable | Personal data of unsuccessful candidates are not retained once the recruitment process is closed. |
| 2. General administration | | | | |
| 2.1 | Queries received from the public | Enquirer's Name, Surname, Email address, Phone number | 1 year | Personal data is removed from the IDPC system. |
| 3. DPO Registers | | | | |
| 3.1 | DPOs register private sector | DPO's name and surname, postal address, e-mail address, contact number | Until the controller or processor informs the IDPC about the change of the DPO. | Information is deleted from the IDPC system. |
| 3.2 | DPOs register public bodies | DPO's name and surname, postal address, e-mail address, contact number | Until the controller or processor informs the IDPC about the change of the DPO. | Information is deleted from the IDPC system. |
| 4. Case Handling | | | | |
| 4.1 | Data Protection Complaints | | | |
| 4.1.1 | Complaint file | Complainant's name, surname, postal address, e-mail address, phone number. Complainant's legal representative name, surname, postal address, email address, contact number, In cases where the data controller is a legal person: data controller's employees/representative name, surname, contact number, email address; where the data controller is an individual: name, surname, postal address, e-mail address, phone number. Personal data about third parties. Appeal documentation. | 10 years starting from when the the case is closed (1) | Paper files are shredded. Information is deleted from the IDPC system. |
| 4.1.2 | IDPC/Tribunal/Court of Appeal Decision | Name and surname of the complainant, being one of the two parties in the decision. | Not Applicable | Information will be retained indefinitely. |
| 4.2 | FOI Complaints | | | |

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| 4.2.1 | FOI file | Applicant's name, surname, e-mail address, postal address, FOI request reference number, Ministry/ Name of Public Authority, Case documentation, | 10 years starting from when the the case is closed | Paper files are shredded. Information is deleted from the IDPC system. |
| 4.2.2 | IDPC/Tribunal/Court of Appeal Decision | Name and surname of the complainant, being one of the two parties in the decision. | Not Applicable | Information will be retained indefinitely. |
| 4.3 | Cross border complaints | | | |
| | IMI* system processing | | | |
| 4.3.1 | Complaints filed with the IDPC | Complainant's name, surname, postal address, e-mail address, phone number - Complainant's legal representative name, surname, postal address, e-mail address, contact number - Data Controller's employees/representative name, surname, contact number, email address - IDPC Officer name, surname, email address, contact number. Personal data realting to third parties. | Depending on the specificities of each type of cooperation, access to the data is blocked and data is made unintelligible as soon as it is no longer necessary for the purpose for which it was collected and, in any event by no later than a period between six to eighteen months after the formal closure of the related cooperation procedure. The blocked data is automatically deleted three years after the formal closure of the related cooperation procedure. | The IMI system automatically blocks and deletes the data. |
| 4.3.2 | Complaints filed with other SAs | Complainant's name, surname, postal address, e-mail address, phone number - Complainant's legal representative name, surname, postal address, e-mail address, contact number -Data Controller's employees/representative name, surname, contact number, email address - Other SA's contact person name, surname, contact number, e-mail address. | Depending on the specificities of each type of cooperation, access to the data is blocked and data is made unintelligible as soon as it is no longer necessary for the purpose for which it was collected and, in any event by no later than a period between six to eighteen months after the formal closure of the related cooperation procedure. The blocked data is automatically deleted three years after the formal closure of the related cooperation procedure. | The IMI system automatically blocks and deletes the data. |
| 4.3.3 | IDPC/Tribunal/Court of Appeal Decision | Name and surname of the complainant, being one of the two parties in the decision. | Depending on the specificities of each type of cooperation, access to the data is blocked and data is made unintelligible as soon as it is no longer necessary for the purpose for which it was collected and, in any event by no later than a period between six to eighteen months after the formal closure of the related cooperation procedure. The blocked data is automatically deleted three years after the formal closure of the related cooperation procedure. | The IMI system automatically blocks and deletes the data. |
| | Internal processing | | | |

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| 4.3.4 | Complaint file | Complainant's name, surname, postal address, e-mail address, phone number - Complainant's legal representative name, surname, address, email address, phone number - Data Controller's employees/representatives name, surname, address from where they carry on their duties, e-mail address - Other SA's contact person name, surname, contact number, e-mail address, IDPC Officer name, surname, email address, contact number. Personal data relating to third parties. | 10 years starting from when the the case is closed | Paper files are shredded |
| 4.3.5 | IDPC/Tribunal/Court of Appeal Decision | Name and surname of the complainant, being one of the two parties in the decision. | Not Applicable | Information will be retained indefinitely |
| 4.4 | Personal Data Breaches | | | |
| 4.4.1 | Personal Data Breach File | Data Controller's name, Organisation registration number, Data Controller's postal address, e-mail address, contact number, Data Controller's employees/representatives name, surmane, address from where they carry on their duties, email address, DPO or data controller's contact point personal detail - Details of other entities outside the Data Controller: name, surname of contact person, e-mail address, contact number, postal address - Name, surname of individuals involved in the breach - IP addresses - Third parties involved in the case. | 10 years starting from when the the case is closed | Paper files are shredded; Information is deleted from the IDPC system (From the date of the decision / court proceedings) |
| 4.4.2 | IDPC/Tribunal/Court of Appeal Decision | Name and surname of the complainant, being one of the two parties in the decision. | Not Applicable | Information will be retained indefinitely |
| 5 | IDPC portal | | | |
| 5.1 | Data protection online complaint | Complainant name, surname, data controller's name, IDPC Officer in charge | Digital file formats have the same retention periods of the corresponding physical files. | Information is deleted from the IDPC system |
| 5.2 | FOI online complaint | Full name of applicant, Ministry / Name of Public Authority, FOI Request reference number, IDPC Officer in charge | Digital file formats have the same retention periods of the corresponding physical files. | Files are deleted from the IDPC system |

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| 5.3 | Online personal data breaches | Data Controller's name, subject matter, Data Controller's sector of activity, IDPC Officer in charge | Digital file formats have the same retention periods of the corresponding physical files. | Files are deleted from the IDPC system |
| 5.4 | Online cross border complaints | Data Controller's name, subject matter, IDPC Officer in charge | Digital file formats have the same retention periods of the corresponding physical files. | Files are deleted from the IDPC system |
| 6. Communication and awareness | | | | |
| 6.1 | Newsletter | Name and surname and email address of the subscriber. | As long as the user remains a subscriber. Once the subscription is terminated a timestamp of the request to unsubscribe together with the subscriber's personal data will be stored for a period of 6 months | Information is permanently erased from the IDPC database. |
| 6.2 | Awareness sessions (Workshops, Webinars) | Name, surname, email address and entity of the subscriber. | Within one week following the event. | Information is permanently erased. |

DEFINITION

IMI System = Internal Market Information System .The IMI system is a mandatory tool for exchange of information between the national authorities in charge of the internal market. The system has been developed by the European Commission in collaboration with Member States with a view to implementing administrative cooperation and mutual assistance in compliance with Regulation 1024/2012/EU. Since the GDPR came into force in 2018 it has been used by Data Protection Authorities to comply with Art 60(12) of the Regulation.

Footnotes

(1) Any case is considered as closed once the related decision has been served and it has not been appealed. In the event of any appeal from the decision the case will be considered as closed once the appeal process becomes final and conclusive.

05/05/2025