

ETHICS OFFICER OF THE COUNCIL OF EUROPE

PRIVACY NOTICE

Last updated on 16 April 2025

This privacy notice explains how the Ethics Officer of the Council of Europe processes personal data.

1. Who is responsible for data processing?

The Ethics Officer acts as a focal point for ethics-related questions and standards in the Council of Europe by providing independent advice to the Secretary General and advice on a confidential basis to Secretariat members and other persons participating in the activities of the Council of Europe, and by promoting and monitoring the effectiveness of the ethics framework of the Organisation.

The Ethics Officer is the data controller, which means she or he has the decision-making power concerning the data processing. The processing of personal data by the Ethics Officer is governed by the [Council of Europe Regulations on the Protection of Personal Data](#) adopted by the Committee of Ministers on 15 June 2022.

2. For what purposes do we process personal data?

The Ethics Officer, including members of the Ethics Officer's team (also "we"), may process personal data to fulfil responsibilities within the [Ethics Officer's mandate](#) such as advisory function, monitoring and standard setting, as well as awareness-raising, training and outreach in relation to the ethics framework. The ethics framework includes the Code of Conduct, the Policy on Respect and Dignity, the Speak Up Policy, the Policy on the Use of Social Media as well as specific staff rules and procurement rules.

In particular, we may process personal data for the purpose of:

2.1 providing advice in relation to the ethics framework, including:

- a) conflicts of interest in areas such as outside activities, gifts, favours and advantages, hospitality, honours, decorations, post-employment situations, procurement and grant-award procedures as well as in situations resulting in reputational risks for the Organisation;
- b) wrongdoing affecting the public interest;
- c) prevention of risks of retaliation for the protection of reporting persons (whistle-blowers) and other categories of persons who shall be protected from retaliation pursuant to the [Speak Up Policy](#);
- d) prevention and responses to harassment and other disrespectful behaviour pursuant to the Policy on Respect and Dignity;

2.2 monitoring activities including:

- a) monitoring the effectiveness of the ethics framework via the collection of information indicative of the prevention, detection and response of ethics risks and breaches;
- b) reviewing data collected for the purpose of conflict of interest management such as declarations of interest, gifts register and outside activities records;

- c) reporting on the activities of the Ethics Office, including release of public reports, and keeping records of communication with requestors.

2.3 awareness-raising and training:

- a) tracking which staff members did e-learning course on Ethics or not and sending reminders;
- b) respond to queries related to awareness-raising and training.

3. What categories of personal data do we process?

We may process any personal data relevant to the Ethics Officer's functions, which may include personal data of Secretariat members and persons external to the Organisation, for example, persons taking part in the Council of Europe activities or those who brought a query to the attention of the Ethic officer.

We may receive the data in person, by phone, by email, via webforms as well as via internal systems and workflows of the Council of Europe used for the purposes of the Ethics Officer.

For the purposes listed in Section 2 above, we may process any personal data deemed necessary to fulfil the role of the Ethics Officer, including sensitive data as defined in Article 5 of the [Council of Europe Regulations on the Protection of Personal Data](#).

Such data may include, but is not limited to, the name and surname, the email address, the function, the division and directorate, personal interests, such as personal relationships, financial, business or liability interests, as well as any personal information relevant for a query.

Specifically for the purpose of monitoring the effectiveness of the ethics framework, we primarily process anonymous and aggregated data.

For the purpose of the gifts register, we process the email addresses of the beneficiary and of his or her manager, as well as information about the gift. If the beneficiary chooses to provide his or her phone number and the MAE, we will also process these data.

Concerning the categories of data processed for the purpose of declarations of interest, a dedicated privacy notice will be released in due course.

For the purpose of awareness-raising and training, we may process the name and surname, email address, job title, MAE, course completion status and details relevant to a query.

4. What is the legal basis for our processing of personal data?

The [legal basis](#) for these processing operations is the Ethics Officer's mandate, the Council of Europe's Staff Regulations and Staff Rules, the Code of Conduct, and other applicable legal instruments adopted by the Council of Europe containing provisions relating to ethics issues.

5. Who has access to your data?

The advisory functions of the Ethics Officer are built on trust. Any information made accessible to us will always be handled confidentially.

We shall not disclose information received in confidence unless:

- a) the person providing the information has given his/her consent to the disclosure;

- b) there is a risk of imminent danger or harm towards individuals or the Organisation's interest, image or reputation; or
- c) such information is requested in the context of an investigative process or audit.

In these situations, we shall provide the information to the pertinent bodies, while protecting – to the extent feasible – the identity of the person who provided the information.

The information contained in the gifts register may be shared with Internal Control unit and the Directorate of Internal Oversight (DIO) Audit and Investigation Divisions for the purposes of internal control, internal audit and internal investigations. These data will be processed in accordance with [the DIO data protection framework](#).

The information contained in the gifts register may also be shared with the Directorate of General Services for the purpose of collecting the gifts and proceeding to inventory.

6. How do we store your personal data?

Personal data are stored electronically on the Council of Europe's servers located in the European Union. We have put in place measures to protect the security of personal information, including appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. These measures include encrypted servers, limited access to any databases for only those people who need it and secure backup of all data.

7. How long will your data be stored?

Your personal data may be retained by the Ethics Officer for a period of up to 3 years from the reception date of the request.

Specifically for the purpose of providing advice in relation to the ethics framework to a Secretariat member, the Ethics Officer retains only the name, surname and MAE of this Secretariat member. When providing advice to a person external to the Council of Europe, the Ethics Officer keeps the email address and the personal data that the external person chooses to provide in the email. Those data are stored for a period up to 3 years from the reception date of the request.

As regards the personal data stored in the gifts register, after assessment of the declaration, the Ethics Officer will retain only non-personal data (the MAE and the date the gift was given). At the same time, the declarations will be stored in the gifts register for five years in case the DIO Audit and/or Investigation Divisions needs to access them for the purposes of internal audit and/or internal investigation.

8. What are your data protection rights?

Under Article 8 of the [Council of Europe Regulations on the Protection of Personal Data](#), you have the right to:

- request access to your personal information held by us;
- request that we correct incomplete or inaccurate personal information that we hold about you;
- request that we delete or remove your personal information when there is no valid reason for us to keep it;
- object to the processing of your personal information on specific grounds relating to your situation.

Please note that, as per Article 10.1.4 of the [Council of Europe Regulations on the Protection of Personal Data](#), exceptions and restrictions may apply to protect the data subject or the rights and fundamental freedoms of others, notably freedom of expression and access to information.

9. Contacts

If you wish to exercise the above rights, or for any queries, concerns, or requests you may have in connection with the way your data is collected and used, please contact:

- the Ethics Officer by sending an email to ethics@coe.int;
- the Council of Europe's Data Protection Officer by sending an email to dpo@coe.int.

If you feel that we have not adequately responded to your request and consider that your data protection rights have been violated as a result of our processing of your personal data, you have the right to lodge a complaint with the Council of Europe Data Protection Commissioner by sending an e-mail to datacommissioner@coe.int.