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EUROPEAN DATA PROTECTION SUPERVISOR

The EU's independent data
protection authority

**Results of the Survey on the
designation and position of the
data protection officer in the EU
institutions, bodies, offices and
agencies**

Table of Contents

1. INTRODUCTION.....	2
2. QUESTIONNAIRE AND REPLIES.....	2
2.1. THE DESIGNATION, KNOWLEDGE AND EXPERIENCE OF THE DPO	2
2.2. THE TASKS AND RESOURCES OF THE DPO	4
2.3. THE ROLE AND POSITION OF THE DPO	7
2.4. GUIDANCE OF THE EDPS	9
3. ANALYSIS OF THE RESULTS.....	9
3.1. DESIGNATION, KNOWLEDGE AND EXPERIENCE OF THE DPO	9
3.2. Tasks and resources	10
3.3. Role and position of the DPO	10
3.4. Further guidance from EDPS	11
3.5. Actions by the EDPS	11
3.5.1. Position Paper on the role of DPOs.....	11
3.5.2. Tools available to DPOs	12
3.5.3. Awareness raising and enforcement actions	12
4. CONCLUSION.....	13
Annex 1: List of the EUIs that responded to the questionnaire.....	14
Annex 2 : EUDPR provisions on the DPO.....	19

1. INTRODUCTION

Under Article 43 of Regulation 2018/1725 (EUDPR)¹, all EU institutions, bodies, offices and agencies (EUIs) must appoint a data protection officer (DPO).

On 27 March 2023, the EDPS sent a questionnaire to all EUIs on the designation, and position of the DPO. The EDPS received 69 responses covering 71 EUIs.²

The EDPS intends to use the results of the questionnaire to identify issues that would deserve specific guidance, as well as to conduct targeted audits and investigations.

This questionnaire is part of the Coordinated Enforcement Framework³ of the European Data Protection Board (EDPB), a broader initiative under which the majority of EDPB members pursue a common topic in a coordinated manner. For 2023, the EDPB decided to prioritise “The Designation and Position of the Data Protection Officer”.

The EDPS shared the results of the questionnaire with the EDPB, which included them in an EEA-wide report on the designation and position of the DPO.

2. QUESTIONNAIRE AND REPLIES

The questionnaire sent to the EUIs consists of four parts, three of which cover different aspects of the DPO function under Articles 43 to 45 EUDPR⁴, i.e. their designation, knowledge and experience; their tasks and resources; their role and position. The last part relates to the EDPS guidance to DPOs.

The questions and replies are reproduced below.

2.1. THE DESIGNATION, KNOWLEDGE AND EXPERIENCE OF THE DPO

1. *Does the person designated as the data protection officer act as the single data protection officer for an EUI or for several EUIs? (Art. 43(2) EUDPR)*

60 Single, 9 Group

¹ Regulation (EU) 2018/1725 of the European Parliament and 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ, L 295, 21.11.2018, pp. 39-98.

² Two of the respondents have been appointed DPO for two separate EUIs and indicated that their replies covered both.

³ EDPB Document on Coordinated Enforcement Framework under Regulation 2016/679 (EDPB, 20 October 2020), https://edpb.europa.eu/sites/default/files/files/file1/edpb_documents_20201020_coordinatedenforcementframework_en.pdf.

⁴ These provisions are reproduced in Annex 2.

2. *Is the data protection officer a staff member of the EUI, or are the tasks fulfilled on the basis of a service contract? (Art. 43(4) EUDPR)*

69

3. *How long is the duration of the data protection officer's appointment to the role (Art. 44(8) EUDPR)?*

N/A. It was not possible to draw relevant conclusions from the replies, as some DPOs submitted replies on the duration of the DPO mandate in their EUI, others replied about their own seniority in the position and others did not provide any concrete numbers. In accordance with Article 44(8) EUDPR, the DPO of an EUI shall be designated for a term of three to five years and shall be eligible for reappointment. The provision does not lay down any limit on how many times a DPO can be reappointed.

4. *To which DG/Unit/Sector does the data protection officer belong? Choose the option that best describes the position of the data protection officer in your EUI.*

a. Highest management	15
b. Administrative management	1
c. Human resources	1
d. Information management	0
e. IT or information security function	1
f. Legal or compliance function	35
g. Other expert role	3
h. Other	13

5. *In which of the following topics does the EUI's data protection officer (or members of their staff) have experience or expert knowledge? Choose all the applicable options. (Art. 43(3) EUDPR)*

a. Data protection and privacy matters	67
b. Information security matters	22
c. Information systems management and/or development	20
d. Data protection processes (e.g. DPIA ⁵ , DSR ⁶ , DBN ⁷)	56
e. Business processes of the organisation's industry or field	39
f. Legislation on the processing and the protection of personal data	63
g. Guidelines of the supervisory authorities on the processing of personal data	57
h. Specific legislation concerning the EUI's field of competence	53

6. *When designating the data protection officer, which of the following factors were set as requirements for the role?*

a. Expert knowledge of data protection regulation	55
b. Expert knowledge of data protection practices	52
c. Expert knowledge of data protection requirements stemming from special legislation applicable to the EUI's field of competence	34
d. Ability to fulfil the tasks pursuant to the EUDPR	64

⁵ Data protection impact assessment.

⁶ Rights of the data subject.

⁷ Data breach notifications.

e. Other professional qualifications	29
No particular expertise on data protection, but the designation was compulsory	5
f. Other	11
7. <i>How many years of experience on the application and the interpretation of data protection requirements does the data protection officer have? (Art. 43(3) EUDPR)</i>	
a. <1 year	3
b. 1–2 years	1
c. 3–5 years	13
d. 6–8 years	21
e. >8 years	31
8. <i>How many years of relevant experience on working in the EUI’s field of competence does the data protection officer have? (Art. 43(3) EUDPR)</i>	
a. >1 year	1
b. 1–2 years	2
c. 3–5 years	6
d. 6–8 years	13
e. >8 years	42
f. Multiple fields of competence	5
9. <i>On a yearly basis, how many hours of training does the data protection officer have in order to develop and/or maintain their professional qualities and expert knowledge on data protection law and practices? (Art. 44(2) EUDPR)</i>	
a. 1–8 hours a year	13
b. 9–16 hours a year	23
c. 17–24 hours a year	12
d. 25–32 hours a year	10
e. >32 hours a year	8
f. 0 hours per year	3

2.2. THE TASKS AND RESOURCES OF THE DPO

10. *Has the EUI’s management clearly defined and given a written description of the data protection officer’s tasks? (Art. 45(1) and 44(6) EUDPR)*

Yes: 64

11. *Has the aforementioned written description of the data protection officer’s tasks been communicated to the personnel of the EUI, or have the tasks been otherwise notified to the staff?*

Yes: 59

12. *Does the written description of the tasks correspond to and cover all the actual tasks of the data protection officer in the EUI?*

Yes: 60

13. Which of the following tasks are assigned to the data protection officer of the EUI? Choose all the applicable options? (Art. 45(1), 44(3), 44(4) and 44(6) EUDPR)

- | | |
|--|----|
| a. Informing and advising on obligations pursuant to data protection regulation | 69 |
| b. Drafting and maintaining of the policies of the EUI in relation to the protection of personal data | 63 |
| c. Participating in the planning of new procedures or changes to existing procedures that involve processing of personal data | 64 |
| d. Monitoring the processing and the protection of personal data | 61 |
| e. Training of the EUI's staff in relation to data protection | 66 |
| f. Providing advice on data protection impact assessments | 69 |
| g. Monitoring the performance of data protection impact assessments | 55 |
| h. Participating in the handling of personal data breaches | 69 |
| i. Reporting to the EUI's management on the EUI's status and development needs in regard to data protection | 66 |
| j. Monitoring the key changes and current issues affecting the data protection in the organisation's field and reporting them to the organisation's management | 55 |
| k. Acting as the point of contact for the EDPS | 68 |
| l. Acting as the point of contact for the data subjects, in particular when they exercise their rights | 64 |

14. Have additional tasks been committed to the data protection officer compared to those envisaged in the EUDPR? If so, please specify which of the following tasks.

- | | |
|---|----|
| a. Decision-making on the processing of personal data | 10 |
| b. Developing the EUI's data protection procedures | 52 |
| c. Drafting and/or carrying out data protection impact assessments | 26 |
| d. Fulfilling data subject requests on their data protection rights | 41 |
| e. Drafting and/or negotiating contracts (e.g., data processing agreements) | 33 |
| f. Responsibility for the lawfulness of the processing of personal data | 16 |
| g. Other | 12 |

15. Does the DPO performs the role of the data protection officer full-time?

Yes: 19

16. Provided the data protection officer is full-time employee, how much of their working hours can the data protection officer allocate to performing the data protection officer's tasks and duties?

- | | |
|------------------------------------|----|
| a. 91–100 % | 10 |
| b. 71–90 % | 4 |
| c. 51–70 % | 5 |
| d. 31–50 % | 10 |
| e. 21–30 % | 9 |
| f. 11–20 % | 8 |
| g. 6–10 % | 2 |
| h. Less than 5 % | 3 |
| i. I do not know or wish to answer | 18 |

17. *How many full-time equivalents (FTE) does the data protection officer have at their disposal for fulfilling the tasks of data protection officer (e.g., a data protection team, partner(s) or other similar arrangement of a permanent nature)? (Art. 44(2) EUDPR)*
- | | |
|-------------------------------------|----|
| a. None (0 FTE) | 21 |
| b. 0–0,9 FTE (a part-time resource) | 27 |
| c. 1,0–2,0 FTE | 9 |
| d. 2,1–4,0 FTE | 4 |
| e. 4,1–6,0 FTE | 7 |
| f. >6 FTE | 1 |
18. *Does the data protection officer have a designated deputy?*
- Yes: 32
19. *Would you estimate the aforementioned resources to be sufficient in order to fulfil the tasks of the data protection officer? (Art. 44(2) EUDPR)*
- Yes: 39
20. *Has the EUI allocated a budget to the data protection officer?*
- Yes: 19
21. *If the data protection officer has other tasks or roles in addition to the tasks of the data protection officer, what are these tasks or roles? If multiple, choose all the applicable options. (Art. 44(2) and 44(6) EUDPR)*
- | | |
|-------------------------------|----|
| a. Management | 50 |
| b. IT or information security | 62 |
| c. Legal or compliance | 27 |
| d. Other expert role | 52 |
| f. Other | 60 |
22. *How many internal requests (formal or informal) for advice regarding the obligations pursuant to data protection regulation did the respondents state that the DPO would receive in a month on average? (Art. 45(1) EUDPR)*
- | | |
|--------------|----|
| a. 0–10 pcs | 24 |
| b. 11–20 pcs | 21 |
| c. 21–30 pcs | 15 |
| d. 31–40 pcs | 5 |
| e. >40 pcs | 4 |

2.3. THE ROLE AND POSITION OF THE DPO

23. *How often is the data protection officer involved and/or consulted in handling and solving issues relating to the processing and protection of personal data in the EUI? (Art. 44(1) EUDPR)*
- | | |
|------------------------------|----|
| a. All the time (100 %) | 12 |
| b. 75–99 % of the time | 35 |
| c. 50–74 % of the time | 12 |
| d. 25–49 % of the time | 3 |
| e. 5–24 % of the time | 3 |
| f. Less than 5 % of the time | 0 |
| g. I do not know | 4 |
24. *Is consulting the data protection officer on issues concerning data protection, e.g. personal data breaches, required by the organisation’s internal processes?*
- | | |
|---|----|
| a. in all processes relevant to processing of personal data | 42 |
| b. in some of the processes relevant to processing of personal data | 27 |
| c. not consulted | 0 |
25. *In general, does the data protection have access to and are they provided with sufficient information on issues relating to data protection and personal data processing operations in the organisation, in order to fulfil their tasks? (Art. 44(1) and 44(2) EUDPR).*
- | | |
|---------------------|----|
| a. All the time | 29 |
| b. Most of the time | 32 |
| c. Sometimes | 8 |
| d. Rarely | 0 |
| e. Never | 0 |
26. *To what extent are the data protection officer’s opinions being followed in the organisation according? (Art. 44(1) and 45 EUDPR)*
- | | |
|------------------|----|
| a. Very well | 35 |
| b. Good | 26 |
| c. Intermediate | 6 |
| d. Poorly | 0 |
| e. Very poorly | 0 |
| f. I do not know | 2 |
27. *In cases when the data protection officer’s advice is not followed by the organisation, are the reasons documented? (Art. 44(1) GDPR)*
- | | |
|---------------------|----|
| a. Always | 21 |
| b. Most of the time | 26 |
| c. Sometimes | 5 |
| d. Rarely | 5 |
| e. Never | 1 |
| f. I do not know | 11 |

28. Does the organisation give instructions to the DPO regarding the exercise of their tasks and duties? (Art. 44(3) and 44(6) EUDPR)

Yes: 6

29. Has the DPO been dismissed or penalised by the organisation for performing their tasks and duties? (Art. 44(3) EUDPR)

Yes: 3

30. Is the data protection officer expected to report regularly to the highest management of the organisation? If so, how frequently (on a yearly basis)? (Art. 44(3) EUDPR)

- | | |
|---|----|
| a. 0 times a year, no reporting is expected | 6 |
| b. 0 times a year, although reporting is expected | 2 |
| c. 1–2 times a year | 34 |
| d. 3–4 times a year | 13 |
| e. >4 times a year | 14 |

31. How is the data protection officer's reporting to the EUI's management carried out? Choose all the applicable options. (Art. 44(3) EUDPR)

- | | |
|---|----|
| a. A written report submitted and/or presented to the board/highest management | 51 |
| b. A written report submitted and/or presented to the lower level of management | 13 |
| c. Other | 29 |
| d. I do not know or wish to answer | 2 |

32. Has the EUI published the contact details of the data protection officer and communicated them to the EDPS? (Art. 43(5) EUDPR)

- | | |
|--|----|
| a. Yes, both | 57 |
| b. Has published, but has not communicated to the EDPS | 4 |
| c. Has not published, but has communicated to the EDPS | 5 |
| d. Neither | 3 |

33. If the EUI has published the data protection officer's contact details, in which of the following means? Choose all the applicable options. (Art. 43(5) GDPR)

- | | |
|-------------------------------------|----|
| a. Privacy/other information notice | 56 |
| b. EUI's public website | 60 |
| c. Other public channel(s) | 7 |
| d. EUI's internal intranet | 52 |
| e. Other internal channel(s) | 15 |

34. Do the data subjects have the opportunity to contact the data protection officer in matters related to the processing of their personal data or the exercise of data subject rights? (Art. 44(4) EUDPR)

- | | |
|---|----|
| a. Yes – in the following ways (choose all the applicable options): | 68 |
| i. Email | 67 |
| ii. Web message (or other equivalent) in an online service | 25 |
| iii. Telephone | 37 |

iv. Letter	35
v. Other	11
b. No	1

35. *How many contact requests (or such) from data subjects does the data protection officer receive in a month on average? (Art. 44(4) EUDPR)*

a. 0–10 pcs	63
b. 11–20 pcs	3
c. 21–30 pcs	0
d. 31–40 pcs	1
e. >40 pcs	2

2.4. GUIDANCE OF THE EDPS

36. *In your opinion, should the EDPS publish centrally on its website the contact details (postal address, a dedicated telephone number, and/or a dedicated e-mail address) of the data protection officers for transparency purposes?*

Yes: 45

37. *What kind of further guidance would the respondents wish to receive from the EDPS in order to clarify the tasks and role of the data protection officer.*

a. Q&As / FAQs	48
b. Online tools	36
c. Additional guidelines	40
d. Training materials or documents for data protection officers	45
e. Training materials or documents to distribute internally within the EUI	47
f. Other	6
g. No further guidance is deemed necessary	4

3. ANALYSIS OF THE RESULTS

3.1. DESIGNATION, KNOWLEDGE AND EXPERIENCE OF THE DPO

Article 43(1) EUDPR provides that all EUIs must designate a DPO. This obligation existed also under the previous legal framework from 2001.⁸

⁸ Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data (OJ L 8, 12.1.2001, p. 1–22).

All DPOs are EUI staff members and the vast majority of DPOs act as DPO for only one EUI, although there are a few examples of DPOs being appointed for several EUIs. The most common structure is to place the DPO function within the legal (or compliance) service of the EUI.

The majority of DPOs report that they have expert knowledge of data protection legislation and/or of data protection practices. Similarly, the work experience of DPOs is in general very impressive; 75% report that they have at least six to eight years of experience of the application and interpretation of data protection requirements. Most DPOs also benefit from regular training, which contributes to a high level of professionalism.

3.2. Tasks and resources

The main issue for DPOs seems to be a lack of resources. This translates both as a lack of time to perform their DPO duties, in particular for part-time DPOs, and as lack of additional staff resources. Almost half of the 69 respondents estimate that their resources are insufficient to fulfil their tasks. Less than half of the DPOs have a deputy and less than 30% have their own budget. 30% indicate that they do not have any full time equivalent at their disposal for fulfilling their tasks and only 40% have a part-time resource.

If the DPOs do not have sufficient time and resources to perform their duties, there is a risk that data protection is not perceived as a priority by their EUI, and that the data protection culture must be further fostered. Even where this is not a conscious choice or a result of negative prioritisation by EUIs, it will inevitably have a negative impact on the internal application of the EUDPR.

The difference in size of the EUIs entails significant differences in resources; larger EUIs naturally have more staff to devote to DPO tasks and may even have a whole team supporting the DPO, whereas smaller EUIs often only have part-time DPOs that carry out other tasks in parallel to their DPO tasks. The largest EUIs (European Commission, European Parliament, etc.) also have appointed Data Protection Coordinators who advise and assist a particular directorate-general or service in all data protection aspects, acting as delegated DPOs. Furthermore, there is a large disparity between the type of personal data processed by the different EUIs. While they all process administrative data relating to HR matters, contracts, etc., not all of them process personal data in their core business. Others, such as Europol and Frontex, process large amounts of sensitive data within the framework of their mandate. The workload and expertise required of DPOs therefore vary a lot from one EUI to another and are not necessarily related to the size of the EUI.

Furthermore, a very large majority report that there is a written description of their tasks and that they are involved in almost all the data protection related tasks listed in the survey. Many DPOs are asked to take on additional tasks, such as developing the organisation's data protection processes, dealing with data subjects' requests to exercise their rights, or drafting/negotiating data processing agreements.

3.3. Role and position of the DPO

Independence of DPOs seems to be respected in almost all EUIs, with only a few reporting that they receive instructions. The fact that some of them are asked to take on additional tasks may, however, give rise to conflicts of interests, for instance when DPOs are asked to both provide advice on data subject requests, and deal with them, although the latter is a task of the data controller.

The large majority replied that they had access to sufficient information to perform their duties all the time or most of the time. Involvement of DPOs is also very satisfactory, with a large majority reporting that they are consulted in 75-100% of all data protection related issues and that their

opinions are followed in most cases. The majority of EUIs also documents the reasons for not following the DPO's advice where applicable.

As many as 51 DPOs state that they submit a written report on their tasks to the board, which the EDPS considers good practice.

A very small number, 3 out of 69 respondents, reported that they have been 'dismissed or penalised for performing their tasks and duties'. Although the number of DPOs reporting having suffered serious negative consequences for carrying out their tasks and duties is small (4%) this is still cause for concern since the independence of the DPO cannot be guaranteed if they risk retaliation for performing their tasks.

3.4. Further guidance from EDPS

As many DPOs struggle with a lack of resources, they often find it difficult and time-consuming to set up procedures and create templates (for instance for data protection impact assessments - DPIAs), whilst providing guidance on a wide range of complex data protection issues. As a large majority of DPOs report that they are involved in almost all the data protection related tasks listed in the questionnaire, they are required to be experts in many different aspects of data protection, both legal and IT-related.

It is thus not surprising that almost all the DPOs requested further guidance from the EDPS to help them fulfil their tasks more efficiently and provide advice that is more impactful to data subjects and controllers within their organisation. There does not seem to be any difference between EUIs, although the issues encountered would in principle be more significant for DPOs with little resources.

The DPOs reported that they would like to receive such guidance both for themselves and for internal distribution within their EUI.

3.5. Actions by the EDPS

3.5.1. Position Paper on the role of DPOs

In 2018, in view of the entry into force of the EUDR, the EDPS issued a [Position Paper](#) on the role of DPOs in EUIs, building on the principles and recommendations set out in a previous paper from 2005. The paper covers the designation, position, and tasks of the DPO, and relations between the DPO and the EDPS.

The EDPS has also carried out fact-finding exercises (i.e. regular surveys sent to EUIs including questions on the DPO role, consultation of the DPOs on the draft DPO Position Paper), investigations in the context of complaints and consultations, and regularly have informal contacts with DPOs on different topics. The outcome of these actions includes survey reports, letters, decisions, recommendations and general guidance.

The EDPS will use the results to feed into the ongoing discussion with the network of EUI DPOs on actions needed to further strengthen the role of DPOs and ensure their independence. A first discussion on the survey results took place at the [EDPS-DPOs meeting of 30 November 2023](#). The discussion covered the main findings of the survey, including the need for more guidance from the EDPS.

In the light of the discussion, the EDPS will update the DPO Position Paper, drawing on the experience gained throughout the years, to give more hands-on guidance, with practical examples, for both EUIs and DPOs.

3.5.2. Tools available to DPOs

In addition to the Position Paper on DPOs, the EDPS has already issued extensive guidance for controllers and DPOs, such as thematic guidelines.⁹ Other tools made available to DPOs include: an annotated EUDPR (wiki); training sessions (including training targeted to newly appointed DPOs); workshops; DPO roundtables (where a small number of DPOs and the EDPS discuss specific topics of interest for DPOs); factsheets; podcasts; Quick News for DPOs (a short monthly newsletter covering topics of interest for DPOs with a practical focus); periodical publications (EDPS newsletter, TechDispatch, TechSonar), etc.¹⁰

Furthermore, the EDPS organises biannual meetings with the EU DPO network. Certain items on the agenda of these meetings are prepared in cooperation with a small group of DPOs (DPO Support Group). At these meetings, the EDPS organises workshops and case studies, together with the DPO Support Group, aimed at giving DPOs practical guidance on different topics. All the above tools and initiatives, contribute to provide support and guidance to DPOs. The EDPS intends to issue further guidance based on converging requests from DPOs on specific topics. This guidance could be given in the form of Q&As and FAQs, training material and documentation, both for the DPOs themselves and for internal distribution within their EUI, as well as guidelines and online and dynamic tools. To facilitate this action, the EDPS has recently appointed a dedicated contact person who will coordinate such requests and act as the entry point between the DPO network and the EDPS

3.5.3. Awareness raising and enforcement actions

Where necessary, EUIs should be encouraged to allocate more resources to the DPO function. Having a strong and independent DPO function that is capable of taking action and ensuring the internal application of the EUDPR, should be seen as an asset, an insurance against future problems. DPOs should also be encouraged to inform the EDPS where there is an issue linked to resources, so that the EDPS can intervene if needed, for example by formally addressing the matter with senior management of the EUI in question

More awareness-raising activities and information on the importance of the independence of the DPO could also be envisaged, in particular directed at senior management. This could be followed by audits or investigations on the matter.

To date, the EDPS has not taken any corrective measures against an EUI for violation of the EUDPR provisions on the DPO. Overall, the outcome of the survey does not seem to warrant any corrective measures or investigative actions by the EDPS. Nevertheless, the EDPS may look into whether the reported cases of dismissal/penalisation require further action.

⁹ Available at: https://edps.europa.eu/data-protection/our-work/our-work-by-type/guidelines_en.

¹⁰ See EDPS website : www.edps.europa.eu (please note that the wiki on the EUDPR and the Quick News are only available to DPOs).

4. CONCLUSION

The level of awareness and compliance of the EUIs is high. Most DPOs seem to have a real impact in their EUI as they report that they are duly involved where required and that their advice is generally followed. The level of experience and expertise of EUI DPOs is also high, a clear indication that the DPO function is becoming more and more professionalised. Most DPOs also benefit from regular training, which contributes to increased professionalism. Furthermore, a very large majority of DPOs are involved in almost all the data protection related tasks listed in the survey. Many DPOs are, however, asked to take on additional tasks, which may at times affect their DPO tasks and their independence at times.

As expected, the main issue for DPOs seems to be a lack of resources. This translates both as a lack of time to perform their DPO duties and as lack of additional staff resources. Even if retaliation remains rare, it is still a cause for concern that three DPOs report having been victim of such measures.

The EDPS will rely on the survey results and the outcome of the discussions with the DPOs at the latest EDPS-DPOs meeting to envisage follow up initiatives, in the form of guidance, awareness raising and possibly enforcement actions.

Annex 1: List of the EUIs that responded to the questionnaire

1.	ACER - European Union Agency for the Cooperation of Energy Regulators
2.	BEREC Office - Agency for Support of the Body of European Regulators for Electronic Communications
3.	CBE - Circular Bio-Based Europe Joint Undertaking
4.	CdT - Translation Centre for the Bodies of the EU
5.	CEDEFOP - European Centre for the Development of Vocational Training
6.	CEPOL - European Union Agency for Law Enforcement Training
7.	CINEA - European Climate, Infrastructure and Environment Executive Agency
8.	CJEU - Court of Justice of the European Union
9.	Clean Aviation Joint Undertaking
10.	Clean Hydrogen Joint Undertaking
11.	CoR - European Committee of the Regions
12.	Council of the European Union and European Council
13.	CPVO - Community Plant Variety Office
14.	EACEA - European Education and Culture Executive Agency

15.	EASA - European Aviation Safety Agency
16.	EBA - European Banking Authority
17.	EC- European Commission
18.	ECA - European Court of Auditors
19.	ECB - European Central Bank and ESRB – European Systemic Risk Board
20.	ECDC - European Centre for Disease Prevention and Control
21.	ECHA - European Chemicals Agency
22.	EDA - European Defence Agency
23.	EDPB - European Data Protection Board
24.	EDPS - European Data Protection Supervisor
25.	EEA -European Environment Agency
26.	EEAA - European Union Agency for Asylum
27.	EEAS - European External Action Service
28.	EESC - European Economic and Social Committee
29.	EFCA - European Fisheries Control Agency
30.	EFSA - European Food Safety Authority

31.	EIB - European Investment Bank
32.	EIF - European Investment Fund
33.	EIGE - European Institute for Gender Equality
34.	EIOPA - European Insurance and Occupations Pensions Authority
35.	EISMEA - European Innovation Council and SMEs Executive Agency
36.	EIT - European Institute of Innovation and Technology
37.	ELA - European Labour Authority
38.	EMA - European Medicines Agency
39.	EMCDDA - European Monitoring Centre for Drugs and Drug Addiction
40.	EMSA - European Maritime Safety Agency
41.	ENISA - European Network and Information Security Agency
42.	EO -European Ombudsman
43.	EP - European Parliament
44.	EPPO - European Public Prosecutor's Office
45.	ERA - European Union Agency for Railways
46.	ERCEA - European Research Council Executive Agency

47.	ESMA - European Securities and Markets Authority
48.	Eu-LISA - European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice
49.	EU-OSHA - European Agency for Safety and Health at Work
50.	EUIPO - European Union Intellectual Property Office
51.	EUISS - European Union Institute for Security Studies
52.	EU-Rail - Europe's Rail Joint Undertaking
53.	Eurofound - European Foundation for the Improvement of Living and Working Conditions
54.	EuroHPC-JU - European High Performance Computing Joint Undertaking
55.	EUROJUST- European Union Agency for Criminal Justice Cooperation
56.	EUROPOL - European Union Agency for Law Enforcement Cooperation
57.	EUSPA - European Union Agency for the Space Programme
58.	FRA- European Union Agency for Fundamental Rights
59.	F4E - Fusion for Energy
60.	FRONTEX - European Border and Coast Guard Agency
61.	GH EDCTP3 - Global Health EDCTP3 Joint Undertaking
62.	HaDEA - Health and Digital Executive Agency

63. KDT - Key Digital Technologies Joint Undertaking
64. OLAF - European Anti-Fraud Office
65. REA - European Research Executive Agency
66. SATCEN - European Union Satellite Centre
67. SESAR - SESAR 3 Joint Undertaking
68. SNS - Smart Networks and Services Joint Undertaking
69. SRB - Single Resolution Board

Annex 2 : EUDPR provisions on the DPO

Article 43 - Designation of the data protection officer

1. Each Union institution or body shall designate a data protection officer.
2. Union institutions and bodies may designate a single data protection officer for several of them, taking into account their organisational structure and size.
3. The data protection officer shall be designated on the basis of professional qualities and, in particular, expert knowledge of data protection law and practices and the ability to fulfil the tasks referred to in Article 45.
4. The data protection officer shall be a staff member of the Union institution or body. Taking into account their size and if the option under paragraph 2 is not exercised, Union institutions and bodies may designate a data protection officer who fulfils his or her tasks on the basis of a service contract.
5. The Union institutions and bodies shall publish the contact details of the data protection officer and communicate them to the European Data Protection Supervisor.

Article 44 - Position of the data protection officer

1. The Union institutions and bodies shall ensure that the data protection officer is involved, properly and in a timely manner, in all issues which relate to the protection of personal data.
2. The Union institutions and bodies shall support the data protection officer in performing the tasks referred to in Article 45 by providing resources necessary to carry out those tasks and access to personal data and processing operations, and to maintain his or her expert knowledge.
3. The Union institutions and bodies shall ensure that the data protection officer does not receive any instructions regarding the exercise of those tasks. He or she shall not be dismissed or penalised by the controller or the processor for performing his or her tasks. The data protection officer shall directly report to the highest management level of the controller or the processor.
4. Data subjects may contact the data protection officer with regard to all issues related to processing of their personal data and to the exercise of their rights under this Regulation.
5. The data protection officer and his or her staff shall be bound by secrecy or confidentiality concerning the performance of their tasks, in accordance with Union law.
6. The data protection officer may fulfil other tasks and duties. The controller or processor shall ensure that any such tasks and duties do not result in a conflict of interests.
7. The data protection officer may be consulted by the controller and the processor, by the staff committee concerned and by any individual on any matter concerning the interpretation or application of this Regulation, without them going through the official channels. No one shall suffer prejudice on account of a matter brought to the attention of the competent data protection officer alleging that a breach of the provisions of this Regulation has taken place.
8. The data protection officer shall be designated for a term of three to five years and shall be eligible for reappointment. The data protection officer may be dismissed from the post by the Union institution or body which designated him or her if he or she no longer fulfils the conditions required for the performance of his or her duties and only with the consent of the European Data Protection Supervisor.
9. After his or her designation the data protection officer shall be registered with the European Data Protection Supervisor by the Union institution or body which designated him or her.

Article 45 - Tasks of the data protection officer

1. The data protection officer shall have the following tasks:
 - (a) to inform and advise the controller or the processor and the employees who carry out processing of their obligations pursuant to this Regulation and to other Union data protection provisions;
 - (b) to ensure in an independent manner the internal application of this Regulation; to monitor compliance with this Regulation, with other applicable Union law containing data protection provisions and with the policies of the controller or processor in relation to the protection of personal data, including the assignment of responsibilities, the raising of awareness and training of staff involved in processing operations, and the related audits;
 - (c) to ensure that data subjects are informed of their rights and obligations pursuant to this Regulation;
 - (d) to provide advice where requested as regards the necessity for a notification or a communication of a personal data breach pursuant to Articles 34 and 35;
 - (e) to provide advice where requested as regards the data protection impact assessment and monitor its performance pursuant to Article 39 and to consult the European Data Protection Supervisor in case of doubt as to the need for a data protection impact assessment;
 - (f) to provide advice where requested as regards the need for prior consultation of the European Data Protection Supervisor pursuant to Article 40; to consult the European Data Protection Supervisor in case of doubt as to the need for a prior consultation;
 - (g) to respond to requests from the European Data Protection Supervisor; within the sphere of his or her competence, to cooperate and consult with the European Data Protection Supervisor at the latter's request or on his or her own initiative;
 - (h) to ensure that the rights and freedoms of data subjects are not adversely affected by processing operations.
2. The data protection officer may make recommendations to the controller and the processor for the practical improvement of data protection and advise them on matters concerning the application of data protection provisions. Furthermore he or she may, on his or her own initiative or at the request of the controller or the processor, the staff committee concerned or any individual, investigate matters and occurrences directly relating to his or her tasks which come to his or her notice, and report back to the person who commissioned the investigation or to the controller or the processor.
3. Further implementing rules concerning the data protection officer shall be adopted by each Union institution or body. The implementing rules shall in particular concern the tasks, duties and powers of the data protection officer.