



RECORD OF PROCESSING ACTIVITIES

Prepared in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation - GDPR) and Organic Law 3/2018, of 5 December on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD)

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1. DATA CONTROLLER DETAILS

DATA CONTROLLER	
Name	CENTRO DE INVESTIGACIÓN BIOMÉDICA EN RED (CIBER)
Tax ID (NIF)	G-85296226
Registered address	Avenida Monforte de Lemos, 3-5; Pabellón 11; Planta baja, 28029 Madrid

2. DATA PROTECTION OFFICER

DATA PROTECTION OFFICER	
Name	Olga María
Surname	Martínez Rodríguez
Address	Avenida Monforte de Lemos, 3-5; Pabellón 11; Planta baja, 28029 Madrid
Email	datos@ciberisciii.es
Telephone number	91 8222091

3. INFORMATION ON PERSONAL DATA PROCESSING

Internal Information System	
Legal basis for processing	<ul style="list-style-type: none"> • GDPR: Article 6(1)(c) - Processing is necessary for compliance with a legal obligation to which the controller is subject. • Law 2/2023 of 20 February, Act regulating the protection of persons who report breaches of the law and combatting corruption.
Purpose for processing	<ul style="list-style-type: none"> • The processing of personal data within the internal information system is carried out for the proper management of reports received in accordance with the provisions of Law 2/2023, with the aim of fostering a culture of transparency and communication as a mechanism for the prevention and detection of threats to the public interest.
Categories of data subjects	<ul style="list-style-type: none"> • Data subjects acting as a whistleblowers
Categories of personal data	<ul style="list-style-type: none"> • Identifying data: name and surname, email address. However, complaints may be submitted anonymously.
Special categories of personal data (if applicable)	<ul style="list-style-type: none"> • Health-related data concerning the physical or mental health of the data subject.
Recipients of personal data	<p>Authorised recipients may include:</p> <ul style="list-style-type: none"> • Public Prosecutor's Office. • State Security Forces and Corps. • Courts and Tribunals. • Competent administrative authorities.
International data transfers	<ul style="list-style-type: none"> • No international transfers of personal data are envisaged.
Envisaged time limits for erasure of the different categories of data	<ul style="list-style-type: none"> • The data shall be retained only for the time necessary to determine whether to initiate an investigation into the

	<p>reported facts. This period may be extended for a maximum of three (3) months from the registration of the communication. In cases of particular complexity, this period may be extended for an additional three (3) months.</p> <ul style="list-style-type: none"> • Communications that are not acted upon shall only be retained only in anonymized form, solely for the purpose of providing evidence of the system's operation.
Technical and organisational security measures	<ul style="list-style-type: none"> • The applicable security measures are set out in CIBER's Security Manual.

Personnel Management	
Legal basis for processing	<ul style="list-style-type: none"> • GDPR: Article 6(1)(b) - Processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract. • GDPR: 6(1)(c) - Processing is necessary for compliance with a legal obligation to which the controller is subject. • Law 30/1984 of 2 August, on the Measures for Civil Service Reform. • Royal Legislative Decree 5/2015 of 30 October, approving the Law on the Basic Statute of the Public Employee. • Law 53/1984 of 26 December, on the Incompatibilities of the Personnel Serving Public Administrations. • Royal Legislative Decree 2/2015 of October 23, by which the revised text of the workers' Statute Law is approved. • Organic Law 3/2018 of 5 December, on Personal Data Protection and Guarantee of Digital Rights. • Organic Law 3/2007 of 22 March, for the Effective Equality between Women and Men. • Royal Decree-Law 6/2019 of 1 March, on the urgent measures for ensuring equal treatment and opportunities between women and men in matters of employment and occupation.

	<ul style="list-style-type: none"> • Royal Decree 592/2014 of 11 July, regulating external academic internships of university students. • Law 31/1995 of 8 November, on Labour Risk Prevention. • Law 54/2003 of 12 December, on the Reform of the Labour Risk Regulatory Framework.
Purpose for processing	<p>The processing of personal data is carried out for the purposes of human resources and payroll management. The intended uses include personnel recruitment, monitoring, training and career development, issuance and payment of payslips, and the management of related documentation.</p> <p>The specific purposes are the following:</p> <ul style="list-style-type: none"> • Personnel management • Payroll administration • Staff training and development • Employment and career progression • Working time monitoring • Occupational risk prevention
Categories of data subjects	<ul style="list-style-type: none"> • Employees under a group employment contract (permanent or temporary staff governed by labour law) • Assigned personnel (personal Adscrito)
Categories of personal data	<ul style="list-style-type: none"> • Identifying data: National or tax ID number (DNI/NIF/NIE are official identification numbers issued in Spain for citizens, residents, and foreign nationals respectively), full name, postal address, email address, telephone number, photograph, Social Security number. • Personal characteristics: Age, marital status, date and place of birth, gender, nationality. • Academic and professional data: Educational background, qualifications, training records, professional experience, memberships in professional bodies or associations.

	<ul style="list-style-type: none"> • Employment-related data: job title, role/function, working hours (entry and exit times). • Financial and insurance data: salary, income, bank account details, payroll information, salary advances, payroll deductions resulting from court orders (where applicable), and other deductions (where applicable). • Transactional data: severance payments and other employment-related financial transactions.
Special categories of personal data	<ul style="list-style-type: none"> • Health-related data: information concerning sick leave, occupational accidents, and degree of disability (excluding medical diagnoses). • Trade union membership: where applicable, data revealing the status of union representation. • Attendance certificates: internal and third-party certificates that may indirectly reveal health status or union activity.
Recipients of personal data	<p>Personal data may be disclosed to third parties in cases provided for by law, and in particular to:</p> <ul style="list-style-type: none"> • Entities responsible for the management of occupational risk prevention. • Social Security Treasury (Tesorería General de la Seguridad Social) • Financial institutions for payroll-related transactions. • State Tax Administration Agency (Agencia Estatal de Administración Tributaria). • General Intervention Board of the State Administration (Intervención General de la Administración del Estado, IGAE). • Court of Auditors (Tribunal de Cuentas). • External auditing entities, where legally required. • All disclosures are made in accordance with applicable legal obligations under Spanish and EU law.
International data transfers	<ul style="list-style-type: none"> • No international transfers of personal data are envisaged.

Data Retention Period	<p>Personal data shall be retained for the time necessary to fulfil the purposes for which it was collected and to determine any potential liabilities arising from such purpose and the processing itself.</p> <p>Retention periods shall comply with applicable legal obligations, including those related to employment, tax, social security, and occupational risk prevention. Archival and documentation regulations shall also apply where relevant.</p> <p>Specially:</p> <ul style="list-style-type: none"> • Financial and payroll-related data shall be retained for a minimum of four years, in accordance with Law 58/2003, of 17 December, on General Taxation. • Employment-related data shall be retained for at least four years, and up to five years for the purposes of labour inspections and sanctions, in accordance with Royal Legislative Decree 5/2000. • Occupational risk prevention records shall be retained for up to ten years, or longer where required by specific regulations, such as those concerning exposure to hazardous agents, in accordance with Law 31/1995 and Law 54/2003. <p>Where applicable, data may be retained for longer periods in accordance with public sector obligations or for the exercise or defence of legal claims.</p>
Technical and organisational security measures	<ul style="list-style-type: none"> • The applicable security measures are set out in CIBER's Security Manual.

Recruitment	
Legal basis for processing	<ul style="list-style-type: none"> • GDPR: Article 6(1)(b): Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. • GDPR: 6(1)(c): Processing is necessary for compliance with a legal obligation to which the controller is subject. • GDPR: 6(1)(e): Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. • GDPR: Article 9(2)(b): Processing special categories of data is permitted when necessary for carrying out obligations and exercising specific rights in the fields of employment and social protection law. • GDPR: Article 9(2)(h): Processing of health-related data is permitted when necessary for the assessment of the working capacity of the employee, medical diagnosis, or the provision of health or social care, under the responsibility of a professional subject to confidentiality obligations. <p>The processing is further supported by the following national legislation:</p> <ul style="list-style-type: none"> • Royal Legislative Decree 5/2015, of 30 October, approving the Law on the Basic Statute of Public Servants. • Royal Legislative Decree 2/2015, of 23 October, approving the consolidated text of the Law on the Statute of Workers. • Organic Law 3/2007, of 22 March, for the Effective

	<p>Equality between Women and Men.</p> <ul style="list-style-type: none"> • Royal Decree-Law 6/2019, of 1 March, on the urgent measures for ensuring equal treatment and opportunities between women and men in matters of employment and occupation.
Purpose for processing	<ul style="list-style-type: none"> • Recruitment through public calls for applications, in accordance with applicable public sector employment regulations.
Categories of data subjects	<ul style="list-style-type: none"> • Individual applying for a position as part of a public recruitment process.
Categories of personal data	<ul style="list-style-type: none"> • Identifying data: Name and surname, National and Tax ID number (DNI/NIE/NIF), identification document, personal registration number, address, signature, telephone number. • Special categories of personal data: health-related data (e.g. disability status), where applicable. • Personal characteristics: Gender, marital status, nationality, age, date and place of birth and family details. • Academic and professional data: Qualifications, training records, and professional experience. • Employment-related data: job history, previous roles, employment status.
Recipients of personal data	<ul style="list-style-type: none"> • Directorate- General for Civil Service (Dirección General de Función Pública). • Official State Gazette (Boletín Oficial del Estado, BOE). • Other public sector entities involved in the recruitment process, where legally required.
International data transfers	<ul style="list-style-type: none"> • No international transfers of personal data are envisaged.

Envisaged time limits for erasure of the different categories of data	<ul style="list-style-type: none"> • Personal data shall be retained only for the time necessary to fulfil the purposes for which it was collected, and to determine any potential liabilities arising from such purposes and the processing itself. • Where applicable, retention periods shall comply with relevant legal obligations, including those related to employment, tax, and archival regulations. • The provisions of applicable archival and documentation regulations shall also apply.
Technical and organisational security measures	<ul style="list-style-type: none"> • The applicable technical and organisational security measures are defined in CIBER's Security Manual in accordance with Article 32 of the GDPR and internal data protection policies.

Financial Management and Administration of Contracts	
Legal basis for processing	<ul style="list-style-type: none"> • GDPR: Article 6(1)(b): Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. • GDPR: Article 6(1)(c): Processing is necessary for compliance with a legal obligation to which the controller is subject. <p>Applicable national legislation includes, but is not limited to:</p> <ul style="list-style-type: none"> • Royal Legislative Decree 2/2015, of 23 October, approving the consolidated text of the Law on the Statute of Workers. • Royal Legislative Decree 5/2015, of 30 October, approving the Law on the Basic Statute of Public Servants

	<ul style="list-style-type: none"> • Law 9/2017, of 8 November, on Public Service Contracts. • Law 47/2003, of 26 November, General Budgetary Law. • Law 58/2003, of 17 December., General Taxation Law. • Law 38/2003, of 17 November, General Law on Subsidies. • Law 40/2015, of 1 October, on the Public Service Legal System. • Law 2/2011, of 4 March, on Sustainable Economy. • General Public Accounting Plan, pursuant to the First Final Provision of Law 16/2007, of 4 July.
Purpose for processing	<ul style="list-style-type: none"> • Management of CIBER's financial operation, including budgeting, accounting and financial reporting. • Administration of contract and supplier relationships, including procurement procedures.
Categories of data subjects	<ul style="list-style-type: none"> • Natural persons or legal representatives of entities supplying goods or services, including participants in public procurement procedures.
Categories of personal data	<ul style="list-style-type: none"> • Identifying data: full name, national and Tax ID number (DNI/NIF/NIE), signature, telephone number, address, and email address. • Employment-related data: job title or function. • Financial and insurance data: Bank account details, invoicing information.

Data Recipients	<p>Personal data may be disclosed, where legally required, to the following entities:</p> <ul style="list-style-type: none"> • State Tax Administration Agency (Agencia Estatal de Administración Tributaria). • General Intervention Board of the State Administration (Intervención General de la Administración del Estado). • Court of Auditors (Tribunal de Cuentas). • Public Sector Contracting Platform. • Public Registry of Contracts. • Financial institutions
International data transfers	No international transfers of personal data are envisaged.
Retention Period	Personal data shall be retained for the duration necessary to fulfil the purposes for which they were collected, and to determine any potential liabilities arising therefrom, in accordance with the provisions of the General Taxation Law 58/2003 and applicable archival and documentation regulations.
Security Measures	Appropriate technical and organisational measures are implemented to ensure the security of personal data, as outlined in the organisation's Security Manual.

Promotion and Outreach Activities	
Legal basis for processing	<ul style="list-style-type: none"> • GDPR: Article 6(1)(e): Processing necessary for compliance with a public service mission or the exercise of public powers conferred to the data controller. • Regulation (EU) 2016/679 - General Data Protection Regulation (GDPR). • Organic Law 3/2018, of 5 December, on Personal Data Protection and Guarantee of Digital Rights.
Purpose for processing	<ul style="list-style-type: none"> • Management of registration and participation in events and activities organised by CIBER. • Dissemination and promotion of such events and activities, including public communication and outreach.

Categories of data subjects	<ul style="list-style-type: none"> Individuals participating in or attending events and activities organised by CIBER.
Categories of personal data	<ul style="list-style-type: none"> Identification data: Name, surname, email address, telephone number.
Data Recipients	<ul style="list-style-type: none"> No data disclosures to third parties are foreseen, except where required by law.
International data transfers	<ul style="list-style-type: none"> No international data transfers are foreseen.
Retention Period	Personal data shall be retained for the duration necessary to fulfil the purpose of processing and until the data subject requests erasure, subject to applicable archival regulations.
Security Measures	Appropriate technical and organisational measures are implemented as outlined in the organisation's Security Manual.

Donors	
Legal basis for processing	GDPR: Article 6(1)(b): Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contact.
Purpose for processing	<ul style="list-style-type: none"> Management of personal data of individuals who collaborate with CIBER through donations.
Categories of data subjects	<ul style="list-style-type: none"> Individuals who make donations to CIBER.
Categories of personal data	<ul style="list-style-type: none"> Identification data: full name, national ID number (DNI), Postal address, telephone number. Financial data: bank account details, donation amount.
Data Recipients	<ul style="list-style-type: none"> State Tax Administration Agency.
International data transfers	<ul style="list-style-type: none"> No international data transfers to third countries are foreseen.
Security Measures	Appropriate technical and organisational measures are implemented as outlined in the organisation's Security Manual.

Research Activities	
Legal basis for processing	<ul style="list-style-type: none"> • GDPR: Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest. • GDPR: Article 9(2)(j): processing of special categories of personal data is permitted for scientific research purposes, subject to appropriate safeguards. • Law 14/2011, of 1 June, on Science, Technology, and Innovation. • Law 14/2007, of 3 July, on Biomedical Research. • Royal Decree 1090/2015, of 4 December, regulating clinical trials with medicinal products, Ethics Committees of research with medicinal products, and the Spanish Registry of Clinical Studies. • Law 2/2011, of 4 March, on Sustainable Economy.
Purpose for processing	<ul style="list-style-type: none"> • Management of personal data of individuals participating in clinical trials, research projects and epidemiological studies. • Processing of personal data within biomedical research projects using a federated analysis model under a joint controllership arrangement. In this model, data remains within the originating institution, and access for research purposes is granted by the data-holding institution. • Sharing of aggregated results or statistical parameters to integrate information across national and international nodes, without transferring identifiable data.
Categories of data subjects	<ul style="list-style-type: none"> • Individuals voluntarily participating in research projects, clinical trials, or epidemiological studies. • Patients.
Categories of personal data	<ul style="list-style-type: none"> • Identification data: Name, surname, address, National ID number (DNI/NIE), telephone number, signature, Social Security number.

Special categories of personal data	<ul style="list-style-type: none"> • Health-related data • Biometric data • Genetic data
Data Recipients	<ul style="list-style-type: none"> • Research entities and public bodies. • Data may be disclosed for the purposes of verifying clinical activity and to comply with legal obligations
International data transfers	<ul style="list-style-type: none"> • International transfers of pseudonymized personal data may be envisaged, subject to the safeguards provided under Article 46 of the GDPR.
Retention Period	<ul style="list-style-type: none"> • Personal data shall be retained for as long as necessary to preserve the health of the data subject or related third parties. Outside these cases, data shall be retained solely for research purposes in anonymised form, without the possibility of identification.
Security Measures	Appropriate technical and organisational measures are implemented as outlined in the organisation's Security Manual.

Biosamples	
Legal basis for processing	<ul style="list-style-type: none"> • GDPR: Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest. • GDPR: Article 9(2)(j): processing of special categories of personal data is permitted for scientific research purposes, subject to appropriate safeguards. • Law 14/2007, of 3 July, on Biomedical Research. • Royal Decree 1716/2011, of 18 November, establishing the basic requirements for the authorisation and functioning of biobanks for biomedical research purposes and the processing of human Biosamples, and regulating the functioning and organisation of the National Registry

	<p>of Biobanks for biomedical research.</p> <ul style="list-style-type: none"> • Law 2/2011, of 4 March, on Sustainable Economy.
Purpose for processing	<ul style="list-style-type: none"> • Management of the quality, use, safety, and traceability of personal data and human biosamples stored in biobanks for the purpose of conducting biomedical research projects.
Categories of data subjects	<ul style="list-style-type: none"> • Individuals who donate biological samples for research purposes.
Categories of personal data	<ul style="list-style-type: none"> • Identification data: full name, national ID number (DNI/NIE), postal address, telephone number, Social Security, or mutual insurance number. • Personal characteristics and social circumstances. • Data concerning health, racial or ethnic origin, and sex life.
Special categories of personal data	<ul style="list-style-type: none"> • Health-related data.
Data Recipients	<ul style="list-style-type: none"> • Research Institutions and biobanks involved in biomedical research projects.
International data transfers	<ul style="list-style-type: none"> • No international data transfers are foreseen.
Data retention periods and erasure criteria	<ul style="list-style-type: none"> • Personal data shall be retained for a minimum period of five years from the date of collection. After this period, the data subject may request erasure of their personal data. • In the absence of such a request, data shall be retained for as long as necessary to safeguard the health of the data subject or related third parties. • Beyond these circumstances, personal data shall only be retained for biomedical research purposes in anonymised form, ensuring that identification of individuals is no longer possible.
Security Measures	<p>Appropriate technical and organisational measures are implemented as outlined in the organisation's Security Manual.</p>

Web Contacts	
Legal basis for processing	<ul style="list-style-type: none"> • GDPR: Article 6(1)(a): the data subject has given consent to the processing of their personal data for one or more specific purposes. • Regulation (EU) 2016/679 - General Data Protection Regulation (GDPR). • Organic Law 3/2018, of 5 December, on Personal Data Protection and Guarantee of Digital Rights.
Purpose for processing	<ul style="list-style-type: none"> • Management of communications from individuals via CIBER's websites and email addresses. • Sending information regarding CIBER's activities, events, and news, subject to the data subject's consent.
Categories of data subjects	<ul style="list-style-type: none"> • Individuals who contact CIBER through CIBER its websites or institutional email addresses.
Categories of personal data	<ul style="list-style-type: none"> • Identification data: Name and surname, national ID number (DNI/NIE), email address, postal address, telephone number.
Data Recipients	<ul style="list-style-type: none"> • No data disclosures to third parties are foreseen, except where required by law.
International data transfers	<ul style="list-style-type: none"> • No international data transfers to third countries are foreseen.
Data Retention Period	<ul style="list-style-type: none"> • Personal data shall be retained until the data subject requests its erasure, in accordance with applicable data protection legislation.
Security Measures	Appropriate technical and organisational measures are implemented as outlined in the organisation's Security Manual.

Training and Educational activities	
Legal basis for processing	<ul style="list-style-type: none"> • GDPR: Article 6(1)(a): the data subject has given consent to the processing of their personal data for one or more specific purposes. • Regulation (EU) 2016/679 - General Data Protection

	<p>Regulation (GDPR).</p> <ul style="list-style-type: none"> • Organic Law 3/2018, of 5 December, on Personal Data Protection and Guarantee of Digital Rights.
Purpose for processing	<ul style="list-style-type: none"> • Management of training and educational activities organised or promoted by CIBER.
Categories of data subjects	<ul style="list-style-type: none"> • Individual participating in or attending training sessions, workshops, congresses, or other educational activities organised by CIBER.
Categories of personal data	<ul style="list-style-type: none"> • Identification data: name and surname, national ID number (DNI/NIE), email address, postal address, telephone number, signature. • Employment-related data: job title or function. • Academic and professional data: qualification, training history.
Data Recipients	<ul style="list-style-type: none"> • No data disclosures to third parties are foreseen, except where required by law.
International data transfers	<ul style="list-style-type: none"> • No international data transfers to third countries are foreseen.
Data Retention Period	<ul style="list-style-type: none"> • Personal data shall be retained until the data subject requests its erasure, in accordance with applicable data protection legislation.
Security Measures	<p>Appropriate technical and organisational measures are implemented as outlined in the organisation's Security Manual.</p>