



Annual Report of the Data Protection Commissioner

1 January - 31 December 2025

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Summary

This is my third report as Data Protection Commissioner, covering the year 2025. I have continued to work with the Data Protection Officer (DPO) to ensure full compliance with the Bank's Data Protection Regulations. During the year, I did not receive any complaint from an individual data subject of non-compliance with the Regulations. The one report of a data breach was of a minor nature. I believe that the Bank is substantially compliant with the high standards it has set itself in the Regulations and am satisfied with the progress made in addressing the remaining issue of data retention. Going forward, the Bank is well placed to be able to demonstrate, as a member of the Council of Europe family, that it will continue to meet the high standards expected of it in an area where the Council has been a major standard-setter.

Introduction

1. This is my third annual report as Data Protection Commissioner, covering the calendar year 2025. It is prepared in accordance with Article 17 of the [CEB Data Protection Regulations](#) which state that the Commissioner *shall prepare an annual report outlining her or his activities. The report shall be transmitted to the Governor and made public.*

2. The main focus of my activity during this 12-month period has been on continuing to work with the Data Protection Officer (DPO) to consolidate the progress reported in my previous reports aimed at ensuring full compliance with the requirements of the Regulations.

3. I visited the Bank's headquarters in Paris on 2 occasions. In the course of these visits, I met with the DPO and the Chief Compliance Officer to discuss progress in achieving full compliance with the Regulations. In the course of the year, I also had contact with the DPO on specific issues. These contacts provided assurance of the Bank's corporate commitment to adherence to the high standards of data protection set out in its Data Protection Regulations, which in turn reflect the leading role of the Council of Europe in promoting the highest standards in this area.

CEB Data Protection Regulations

4. The Regulations – which entered fully into force on 1 July 2024, following a transition period – provide for a revised, comprehensive system of protection of personal data within the Bank, modelled closely on the

provisions of the Council of Europe's *Modernised Convention for the Protection of individuals with regard to the Processing of Personal Data* ("Convention 108+") and the *Council of Europe Regulations on the Protection of Personal Data*.

5. The Regulations involve a strengthening of governance arrangements for data protection, notably by replacing an internal committee with an independent data protection officer (DPO) and an external data protection commissioner (DPC). Accountability lies with *data controllers*: those within the Bank with decision-making powers with respect to processing of personal data.

Record of Processing Activities (ROPA)

6. Article 9.8 of the Regulations imposes an obligation on each *data controller* to maintain a record of processing activities under its responsibility. In practice, this is done in close collaboration with the DPO, who maintains a master record of all categories of personal data being processed by the Bank.

7. The ROPA shows that the main category of personal data processed by the Bank is the data of its employees and contractors. This can include *special categories of data* as defined in Article 5, such as personal data relating to health and to disciplinary proceedings. Other categories include contact details of persons within entities that the Bank deals within its role as a borrower and lender of funds. The nature of the Bank's activities does not require the collection of personal data of the ultimate beneficiaries of its loans. The ROPA was updated in the course of the year, notably to record revised retention periods in respect of certain data categories included in the Bank's new ERP system.

Transparency

8. Article 7 of the Regulations imposes an obligation on *data controllers* to convey information to *data subjects* on the details of the personal data being processed about them, and the roles of the DPO and DPC. The relevant information was issued to all staff at the end of 2023 and is available on the Bank's intranet.

Promotion of Awareness and Training

9. Article 14.2 (j) of the Regulations assigns as one of the tasks of the *DPO to promote awareness in the Bank of data protection principles, such as rights of data subjects and obligations in the processing of personal data*.

10. The Bank's intranet includes a page dedicated to data protection, which includes guides and a video on the subject and my annual report. Data protection is part of the induction programme delivered to new hires. The DPO has delivered targeted training to staff dealing with HR data - the main category of personal data processed by the Bank – and to designated compliance liaison officers in each of the Bank's divisions. The DPO has also provided detailed advice on data security and on the use of AI tools by bank staff.

Data Protection Impact Assessments (DPIA)

11. Article 9.4 of the Regulations obliges data controllers to consult the DPO *where a type of processing of personal data is likely to result in a risk to the rights and fundamental freedoms of the data subjects due notably to the nature and volume of the data or the nature, scope and purpose of the processing* and for the DPO to consult the DPC in appropriate cases.

12. The DPO has been heavily involved in advising data controllers in the preparation of such DPIAs and has consulted me as appropriate. In the course of 2025, DPIAs were prepared, *inter alia*, on key aspects of the new ERP system which has been rolled out in the Bank and which covers the main HR processes.

Data Security

13. Article 6 of the Regulations requires each data controller to *take appropriate security measures against risks such as accidental or unauthorised access, destruction, loss, use, modification or disclosure of personal data.*

14. In view of the sensitive nature of its activities as a bank, the CEB has strict policies governing data security. These cover areas such as access control, authentication, audit, monitoring, alarms, data storage and back up and transmission standards and environment integrity. As the DPO is also the Bank's Chief Information Security Officer, data security is a high priority, including in the development of the new ERP system.

Data Breaches

15. Article 6.3 of the Regulations provides that any data breach must be notified by the relevant data controller to the DPO who *shall notify, without delay, the Data Protection Commissioner and the affected data subject(s) of those data breaches which may seriously interfere with their rights and fundamental freedoms.*

16. The DPO notified me on 17 March of a minor data breach. This involved a contractor, working on the implementation of the new ERP system, sharing an email containing CEB staff salaries with 3 individuals who did not have a legitimate reason to receive this information. I was fully satisfied with the actions taken by the DPO to have the appropriate mitigation measures taken and to guard against a recurrence.

Transfers of Personal Data

17. Article 12.1 of the Regulations provides that *the transfer of personal data outside the Bank to a recipient within a State's jurisdiction or to another international organisation may only take place where the Data Protection Commissioner finds that a level of protection equivalent to that of these Regulations, which are based on the provisions of the Convention 108+, is secured.* It was not necessary to authorise any such transfer in the course of 2025 as all relevant transfers were covered by the general authorisation I issued in 2022 and which is described in previous annual reports.

External Engagement and Visibility

18. In September, I joined the DPO and the Chief Compliance Officer at the annual Workshop on Data Protection within International Organisations. Hosted in Paris by UNESCO, with the support of the European Data Protection Supervisor, this meeting proved a useful opportunity to exchange on topics of common interest with our colleagues in other international organisations.

19. Also, in September, I attended the 47th meeting of the Global Privacy Assembly (GPA) in Seoul. This annual gathering of data protection and privacy commissioners addressed a wide range of topics in its open and restricted sessions as well as offering opportunities for informal networking.

20. In October, I attended the 60th Anniversary Conference of the Council of Europe's Administrative Tribunal in Strasbourg. The Tribunal is the appellate body for decisions taken on complaints related to data protection.

Complaints

21. Article 18.1 of the Regulations provides that *any data subject may lodge a complaint with the Data Protection Commissioner if she or he considers that her or his rights under the present Regulations have been contravened.* The remaining parts of Article 18 provide that the DPC must examine the complaint and communicate her/his *reasoned findings* to the Governor who must take a decision in accordance with the

findings. A complainant may appeal the Governor's decision to the Administrative Tribunal. No such complaint was submitted to me in 2025.

Conclusion

22. This, my third report as Data Protection Commissioner, continues to show an organisation that is taking seriously its responsibilities as custodian of personal data. The CEB Data Protection Regulations set the high standard that would be expected of a body that is part of the Council of Europe family, with its distinguished tradition of promoting the highest standards of data protection, viewed as part of the fundamental right to privacy. The Bank has taken the necessary steps to ensure that it is compliant with these Regulations, including ongoing work in the area of data retention. Going forward, this focus on substantive compliance will need to continue as new challenges arise in the area of data protection.