

# CONSULTATION PAPER

on the proposal for Guidelines to specify further the qualitative and quantitative indicators in pre-emptive recovery planning

EIOPA-BoS-25/582  
8 December 2025



**eiopa**

European Insurance and  
Occupational Pensions Authority

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## RESPONDING TO THIS PAPER

EIOPA welcomes comments on the Consultation Paper on the proposal for Guidelines to specify further the qualitative and quantitative indicators on pre-emptive recovery planning.

Comments are most helpful if they:

- ▶ respond to the question stated, where applicable;
- ▶ contain a clear rationale; and
- ▶ describe any alternatives EIOPA should consider.

Please send your comments to EIOPA via EU survey <https://ec.europa.eu/eusurvey/runner/fcf46e34-d7b7-eae7-bdac-68ddaa1198f6> by 20 March 2026, 23:59 CET.

Contributions not provided via EU Survey or after the deadline will not be processed. In case you have any questions please contact [IRRD\\_PC@eiopa.europa.eu](mailto:IRRD_PC@eiopa.europa.eu).

### Publication of responses

Your responses will be published on the EIOPA website unless: you request to treat them confidential, or they are unlawful, or they would infringe the rights of any third-party. Please, indicate clearly and prominently in your submission any part you do not wish to be publicly disclosed. EIOPA may also publish a summary of the survey input received on its website.

Please note that EIOPA is subject to Regulation (EC) No 1049/2001 regarding public access to documents and EIOPA's rules on public access to documents.<sup>1</sup>

### Declaration by the contributor

By sending your contribution to EIOPA you consent to publication of all non-confidential information in your contribution, in whole/in part – as indicated in your responses, including to the publication of the name of your organisation, and you thereby declare that nothing within your response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.

### Data protection

Please note that personal contact details (such as name of individuals, email addresses and phone numbers) will not be published. EIOPA, as a European Authority, will process any personal data in line with Regulation (EU) 2018/1725. More information on how personal data are treated can be found in the privacy statement at the end of this material.

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<sup>1</sup> [Public Access to Documents](#)

## CONSULTATION PAPER OVERVIEW & NEXT STEPS

EIOPA carries out consultations in the case of Guidelines and Recommendations in accordance to Article 16 (2) of the EIOPA Regulation.

This Consultation Paper presents the draft Guidelines and explanatory text.

The analysis of the expected impact from the proposed policy is covered under Annex I (Impact Assessment).

### Next steps

EIOPA will revise the proposal in view of the stakeholder comments received. EIOPA will publish a report on the consultation including the revised proposal and the resolution of stakeholder comments.

# 1. GUIDELINES

## INTRODUCTION

- 1.1. In accordance with Article 16 of Regulation (EU) No 1094/2010 (EIOPA Regulation)<sup>2</sup> and with Article 5(11), point (b), of Directive (EU) 2025/1<sup>3</sup>, EIOPA issues these Guidelines to specify further the qualitative and quantitative indicators contained in the pre-emptive recovery plans of insurance and reinsurance undertakings (hereafter: “undertakings”) and groups.
- 1.2. These guidelines are issued in relation to the criteria listed in Article 5(8) of Directive (EU) 2025/1 (“the criteria”).
- 1.3. These Guidelines have been developed in line with EIOPA’s views for better regulation and supervision<sup>4</sup>, thereby enhancing supervisory convergence through simpler, more efficient frameworks.
- 1.4. When selecting indicators, undertakings and groups should have due regard to the consistency of the indicators with the general risk management framework of the undertaking or group covered by the plan and to the relevance of those indicators to the undertaking’s or group’s business model and strategy, as specified in Article 4 of the Commission Delegated Regulation (EU) No xyz/xyz [on content of the pre-emptive recovery plans].
- 1.5. Qualitative indicators are non-numerical indicators that capture elements of risk which cannot be readily expressed in quantitative terms but are relevant to an institution’s business model, risk profile and consistent with their internal risk management framework. The calibration of these indicators typically relies on expert judgment or institution-specific characteristics. Undertakings and groups may include such indicators, where appropriate, to complement quantitative indicators and support the timely identification of a deterioration.
- 1.6. These Guidelines are addressed to competent authorities as defined in Article 4(2), point (i), of the EIOPA Regulation and to financial institutions as defined in Article 4(1) of that Regulation.
- 1.7. The Guidelines apply from 30 January 2027.
- 1.8. If not defined in these Guidelines, the terms have the meaning defined in the legal acts referred to in the introduction.

### Guideline 1 – Requirements for the calibration of recovery plan indicators

- 1.9. The calibration of the pre-emptive recovery plan indicators should ensure that appropriate levels are set to alert the undertaking or group early enough and can allow the undertaking or group to react promptly and effectively in a crisis situation and ahead of the adoption of the

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<sup>2</sup> Regulation (EU) 1094/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Insurance and Occupational Pensions Authority), amending Decision No 716/2009/EC and repealing Commission Decision 2009/79/EC OJ L 331, 15.12.2010, p. 48–83

<sup>3</sup> Directive (EU) 2025/1 of the European Parliament and of the Council of 27 November 2024 establishing a framework for the recovery and resolution of insurance and reinsurance undertakings and amending Directives 2002/47/EC, 2004/25/EC, 2007/36/EC, 2014/59/EU and (EU) 2017/1132 and Regulations (EU) No 1094/2010, (EU) No 648/2012, (EU) No 806/2014 and (EU) 2017/1129 (OJ L, 2025/1, 8.1.2025).

<sup>4</sup> Bolder, Simpler, Faster: EIOPA’s views for better regulation and supervision (EIOPA-BoS-25/118), 8 April 2025.

supervisory measures foreseen in Article 136a of the Directive 138/2009/EC. In accordance with Article 5(8) of Directive (EU) 2025/1, indicators should identify the points at which remedial actions should be considered or taken.

- 1.10. When selecting and calibrating indicators, particular regard should be given to the fact that indicators may differ in their sensitivity to capture deterioration. In particular, liquidity deterioration may not be captured immediately by indicators relating to capital. An undertaking or a group may suffer from liquidity deterioration not accompanied by a breach or a likely breach of capital requirements and vice versa. Therefore, it is important that the pre-emptive recovery plan provides for a range of indicators of different nature compared with those related to capital requirements.
- 1.11. When calibrating indicators, the undertaking or a group should consider ways to address the issues stemming from the fact that certain remedial actions to restore the capital position can be subject to longer execution periods, contractual obligations or greater sensitivity to market and other conditions. In particular, such actions could relate to material contractual maturities relating to capital instruments, such as subordinated debt and subordinated loans, and potential dividend payments, as relevant.

## **Guideline 2 – Capital indicators**

- 1.12. Capital indicators should identify any significant actual and likely future deterioration in the coverage of capital requirements and in the quantity and quality of eligible own funds.
- 1.13. When considering capital indicators, undertakings or groups should take into account the impact of transitional measures on the solvency position laid down in Article 308c and Article 308d of Directive 2009/138/EC (Solvency II)<sup>5</sup>.
- 1.14. Capital indicators should include at a minimum the breach of the solvency capital requirement (SCR). Undertakings and groups should consider capital indicators that are most appropriate to their business and could include the minimum capital requirement (MCR) and the SCR.

## **Guideline 3 – Liquidity indicators**

- 1.15. Liquidity indicators should identify the potential for or an actual deterioration of the capacity of the undertaking or group to meet its current and foreseen liquidity and funding needs.
- 1.16. The undertaking's or group's liquidity indicators could, where relevant, refer to both the short-term and long-term liquidity and funding needs as laid down in Article 144a of Directive 2009/138/EC, even under stressed conditions.
- 1.17. The liquidity indicators should be integrated within the strategies, policies, processes and systems developed by each undertaking or group pursuant to Articles 144a and 246a of Directive 2009/138/EC regarding the need to draw up and keep up to date a liquidity risk management plan.

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<sup>5</sup> Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II), (OJ L 335, 17.12.2009, p. 1).

- 1.18. The liquidity indicators should cover the criteria specified in Article 1(3) of Commission Delegated Regulation (EU) No xyz/xyz on liquidity risk management plans<sup>6</sup>.
- 1.19. Undertakings and groups should consider liquidity indicators that are most appropriate to their business and could include the liquid assets ratio (% Total assets).<sup>7</sup>

#### Guideline 4 – Asset quality indicators

- 1.20. Asset quality indicators should identify any actual and likely future asset quality deterioration of the whole portfolio of assets of the undertaking or group.
- 1.21. The asset quality indicators should cover, where relevant, aspects such as reinsurance recoverables and receivables.
- 1.22. Undertakings and groups should consider asset quality indicators that are most appropriate to their business and could include the average rating of investments (credit quality step) and share of below investment grade investments (credit quality step >3).

#### Guideline 5 – Profitability indicators

- 1.23. Profitability indicators should identify any actual and likely future deterioration in the undertaking's or group's financial position due to insurance or investment related losses.
- 1.24. Indicators which measure the performance of underwriting should be included under profitability indicators such as the loss ratio.
- 1.25. Reserving indicators should measure and monitor the development of technical provisions of the undertaking or group and measure any deterioration of the adequacy in technical provisions. Reserving indicators may include changes in key reserving assumptions such as adverse development in mortality or morbidity assumptions that have an adverse effect on the change of value of liabilities, changes in relevant yield curve, investments, lapse rates or changes to the value of options and guarantees or expected profits included in future premiums.
- 1.26. Investment related indicators may include price movements of sovereign or corporate bonds or derivatives the undertaking or group has invested in, as well as, coupons and the undertaking's or group's investments concentration to a single counterparty.
- 1.27. Undertakings and groups may also include indicators such as the expense ratio which measure costs and expenses of carrying on insurance business and cost efficiency, which compare costs and expenses against income generated.
- 1.28. Undertakings and groups should consider other profitability indicators that are most appropriate to their business and could include the combined ratio (non-life business), return on investments (life business) and premium growth (split by the type of business).

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<sup>6</sup> COMMISSION DELEGATED REGULATION (EU) No .../... supplementing Directive 2009/138/EC of the European Parliament and of the Council with regard to regulatory technical standards for liquidity risk management plans

<sup>7</sup> Liquid assets should be estimated in line with paragraph 73 in [Insurance Stress Test 2024 Technical specifications](#).

### **Guideline 6 – Market conditions indicators**

- 1.29. Market conditions indicators should identify the market's reaction or perception of the decline in investment performance of equity or debt instruments issued by the undertaking or group, as well as the fall in market confidence in their financial position.
- 1.30. Undertakings and groups should consider market conditions indicators that are most appropriate to their business and could include adverse share price movements, rating downgrades and credit default swap (CDS) spreads of the undertaking or group.

### **Guideline 7 – Macro-economic conditions indicators**

- 1.31. Macroeconomic indicators should identify deterioration in the economic conditions in which the undertaking or group operates, or of geographical and sectoral concentrations of exposures or worsening funding conditions.
- 1.32. As such, they should capture adverse changes in economic variables such as interest rates, credit default spreads, unemployment rates, exchange rates, inflation or real estate prices.
- 1.33. The range of macroeconomic conditions indicators should take into account the impact on the undertaking's or group's financial position from material correlations between macroeconomic conditions and the insurance portfolio in particular resulting from different types of insurance liabilities and the assets backing those liabilities.
- 1.34. Undertakings and groups should consider macroeconomic indicators that are most appropriate to their business and could include the inflation forecast (percentage change in average consumer prices), unemployment forecast (percentage of total labour force), sovereign CDS spreads, real estate prices (annual average rate of change).

### **Guideline 8 – Operational events indicators**

- 1.35. Operational indicators should capture operational events, arising from inadequate or failed internal processes, personnel or systems, including in respect of outsourced processes or from external events, that could threaten the financial position of the undertaking or group.
- 1.36. Undertakings and groups should consider operational events indicators that are most appropriate to their business and could relate to events such as fraud, regulatory or legal fines, and cyber-attacks.

### **COMPLIANCE AND REPORTING RULES**

- 1.37. This document contains Guidelines issued under Article 16 of the EIOPA Regulation. In accordance with Article 16(3) of the EIOPA Regulation, competent authorities and financial institutions are required to make every effort to comply with guidelines and recommendations.
- 1.38. Competent authorities that comply or intend to comply with these Guidelines should incorporate them into their regulatory or supervisory framework in an appropriate manner.
- 1.39. Competent authorities are to confirm to EIOPA whether they comply or intend to comply with these Guidelines, with reasons for non-compliance, within two months after the issuance of the translated versions.



- 1.40. In the absence of a response by this deadline, competent authorities will be considered as non-compliant to the reporting and reported as such.

#### FINAL PROVISION ON REVIEWS

- 1.41. These Guidelines will be subject to a review by EIOPA.

## ANNEX I: IMPACT ASSESSMENT

### OBJECTIVES

In accordance with Article 29 of the EIOPA Regulation, EIOPA carries out, where relevant, an analysis of the costs and benefits during the policy development process. The analysis of costs and benefits is undertaken according to the impact assessment methodology.

The starting point for this impact assessment is that existing provisions following from the level 1 text are already in place and that the other provisions included in this consultation paper will be implemented as proposed. As a result, this assessment only considers the additional impact of each specific policy issue under discussion.

This impact assessment covers the policy issue of not including additional criteria compared to the list of criteria provided in the IRRD and has been completed by EIOPA on a qualitative basis. In drafting these Guidelines, EIOPA has ensured alignment with the general objectives of the Directive (EU) 2025/1, as agreed by the legislators.

These general objectives are to enable supervisory authorities to:

- Reduce the likelihood of failure;
- Enhance preparation, coordination and cooperation;
- Ensure a proper functioning of the internal market and ensuring level playing field.

In view of the specific purpose of these Guidelines, the following more specific objectives were identified, for supervisory authorities to:

- Promote good risk management with indicators included in the pre-emptive recovery plan being the most relevant to (re)insurance undertakings and groups
- Ensure a level playing field through common minimum harmonisation rules with regard to the indicators used.
- Enable effective and efficient supervision, ensuring authorities are provided with the most relevant information to allow proper assessment of the framework of indicators.

### POLICY ISSUES

#### Policy Issue A: Inclusion of additional criteria compared to list of criteria provided in the IRRD.

In accordance with Article 5(11) of the IRRD the Guidelines should “further specify” the qualitative and quantitative indicators as referred in Article 5(8) which will be included in the pre-emptive recovery plan as per Article 5(1). The indicators set out in the Guidelines relate only to list provided by the IRRD as per Article 5(8). This policy issue considers the need to include additional criteria to the ones provided by IRRD.

## POLICY OPTIONS

### [Policy Issue A: Inclusion of additional criteria compared to list of criteria provided in the IRRD.]

#### Policy option A.1: Guidelines include additional criteria to the ones provided in IRRD.

Under this option, additional criteria are added to the ones provided in the IRRD and subsequently additional indicators to be considered by undertakings and groups.

#### Policy option A.2: Guidelines do not include other criteria to the ones provided in IRRD.

Under this option, no other criteria in addition to the ones provided in the IRRD are included and consequently no additional indicators.

## IMPACT OF THE POLICY OPTIONS

In assessing the impact of the policy options, special attention is devoted to the potential areas or functions where the costs could arise as a result of the different policy options. A more detailed estimation of the (monetary) costs would depend on several variables, such as the company-specific process and procedures, the size and nature of the entity and the applicable resolution framework at national level, including the potential contribution to financing arrangements

### Policy Issue A: Inclusion of additional criteria compared to list of criteria provided in the IRRD

Policy option A.1: Guidelines include additional criteria to the ones provided in the IRRD.		
Costs	Policyholders	No impact
	Industry	The risk management and compliance functions would face more burden to assess whether the additional criteria are relevant and consequently include additional indicators in their pre-emptive recovery plans Actuarial and finance teams may also need to generate additional metrics. This would require additional resources across the board and systematically lead to higher costs even though most of the additional criteria may be of limited relevance in most cases.
	Supervisors	More burden on supervisors to assess whether the additional indicators are relevant for undertakings and thresholds set are appropriate. This would increase analytical workload and subsequently increase supervisory costs, potentially stretching resources away from higher-priority supervisory activities
	Other	No impact.

<b>Benefits</b>	Policyholders	No benefits.
	Industry	Risk management and planning functions gain a more comprehensive risk management framework and preparedness for crisis situation.
	Supervisors	Supervisory authorities gain greater consistency in the information presented across undertakings in pre-emptive recovery plans which, in the end, may result in more comparable information.
	Other	No impact.

**Policy option A.2: Guidelines do not include other criteria to the ones provided in the IRRD.**

<b>Costs</b>	Policyholders	No impact.
	Industry	Minimum list of criteria and indicators might not be sufficient for certain undertakings with specific characteristics. In such exceptional cases, these undertakings may incur additional costs, as they would need to assess the appropriateness of further criteria. Input would be required from risk management and compliance functions to adapt the pre-emptive recovery plans. Such costs would be however proportionate and justified as they reflect the undertaking's specific characteristics and hence the need to include additional criteria.
	Supervisors	In case where the minimum list of criteria and indicators are considered insufficient, supervisory authorities will face more burden to assess whether additional criteria and indicators included are reasonable. This could potentially increase workload and subsequently increase supervisory costs.
	Other	No impact.
<b>Benefits</b>	Policyholders	No impact.
	Industry	Risk management and actuarial or planning functions benefit from less burden as fewer criteria and indicators should be assessed and considered. Subsequently this minimizes differences between Members states, thereby increasing the likelihood of similar outcomes for similar types of undertakings, thus increasing the level playing field. Management would benefit from clearer expectations and a simpler framework of indicators overall.
	Supervisors	Supervisors can benefit from a less demanding review process, focusing primarily on the IRRD minimum criteria. Optional indicators tailored to their market specificities can still be added, without the need for assessing further indicators when this is not relevant. This enables more efficient and consistent supervision.
	Other	No impact.

## COMPARISON OF POLICY OPTIONS

### Policy Issue A: Inclusion of additional criteria compared to list of criteria provided in the IRRD

EFFECTIVENESS (0,+,++)			
	Promote good risk management	Ensure a level playing field	Enable effective and efficient supervision
Policy option A.1	++	0	++
Policy option A.2	++	+	++

EFFICIENCY (0,+,++)			
	Promote good risk management	Ensure a level playing field	Enable effective and efficient supervision
Policy option A.1	+	+	+
Policy option A.2	++	+	++

While policy option A1 would provide a broader set of criteria, the inclusion of additional ones is expected to systematically increase costs and reporting burden for the industry as well as higher costs for the supervisors who will need to interpret and assess the new criteria and indicators which might be of limited relevance. This could divert resources away from core recovery planning activities, while adding complexity without necessarily improving preparedness. By contrast, Policy option A2 would streamline costs for both the industry and supervisors as there are no new reporting obligations beyond the pre-existing criteria in IRRD, while safeguarding the feasibility and credibility of the pre-emptive recovery plan.

## PREFERRED OPTION

Based on the impact assessment of the policy issue the preferred option is to **not include other criteria to the ones provided in IRRD as per policy option A2.**

This approach avoids imposing unnecessary administrative and financial burden on both supervisors and the industry, while ensuring that the pre-emptive recovery planning remains credible and feasible. More specifically, it avoids providing long lists of criteria and subsequently additional indicators for the

undertakings to consider and authorities to assess whether the indicators considered are appropriate, which could otherwise systematically increase costs and divert resources from core pre-emptive recovery planning activities, while providing the flexibility for other indicators to be included by undertakings based on their specificities. It also supports the objective of increasing the level playing field by setting a minimum list of indicators to be considered. In exceptional cases, undertakings with specific characteristics can still include additional indicators, ensuring that the framework of indicators remains proportional and flexible. Moreover, while additional criteria could strengthen early detection of risk, they could be less relevant/material to the criteria provided by Level 1 IRRD and would result in higher compliance and supervisory costs. Overall, policy option A2 seems to be the more proportionate and efficient approach, reduces unnecessary burden, promotes consistency across Member states and maintains the alignment with the IRRD.

Nevertheless, following the implementation of the IRRD, EIOPA would be in a position to identify best practices and review the Guidelines accordingly.

## 2. EXPLANATORY TEXT

### GUIDELINE 7 – MACRO – ECONOMICS CONDITIONS INDICATORS

1.30 Macroeconomic indicators should identify deterioration in the economic conditions in which the undertaking or group operates, or of geographical and sectoral concentrations of exposures or worsening funding conditions.

1.31 As such, they should capture adverse changes in economic variables such as interest rates, credit default spreads, unemployment rates, exchange rates, inflation or real estate prices.

1.32 The range of macroeconomic conditions indicators should take into account the impact on the undertaking's financial position from material correlations between macroeconomic conditions and the insurance portfolio in particular resulting from types of insurance liabilities and the assets backing those liabilities.

1.33 Undertakings and groups should consider macroeconomic indicators that are most appropriate to their business and could include the Inflation forecast (percentage change in average consumer prices), Unemployment forecast (percentage of total labour force), Sovereign CDS spreads, real estate prices (annual average rate of change).

1.1 In accordance with Article 5(8) of Directive (EU) 2025/1, indicators should identify the points at which remedial actions should be considered or taken.

1.2 Macro-economic conditions indicators may not always lead to a remedial action being taken as this depends on the relevance of the indicators to the specific undertaking's or group's business model and risk profile. Nonetheless, these indicators should generally serve to alert the undertaking or group when they deteriorate or show signs of deterioration.

## ANNEX II: OVERVIEW OF QUESTIONS FOR CONSULTATION

The questions are set out in an EU-Survey (<https://ec.europa.eu/eusurvey/runner/fcf46e34-d7b7-eae7-bdac-68ddaa1198f6>).





## PRIVACY STATEMENT

### ► Introduction

1. The European Insurance and Occupational Pension authority (EIOPA) is committed to protecting individuals' personal data in accordance with Regulation (EU) 2018/1725<sup>8</sup> (further referred as "the Regulation").
2. In line with Articles 15 and 16 of the Regulation, this privacy statement provides information to the data subjects relating to the processing of their personal data carried out by EIOPA.

### ► Purpose of the processing of personal data

3. Personal data is collected and processed to manage online public consultations EIOPA launches, and to conduct online surveys, including via online platform EUSurvey<sup>9</sup>, and to facilitate further communication with participating stakeholders (e.g., when clarifications are needed on the information supplied or for the purposes of follow-up discussions that the participating stakeholders may agree to in the context of the consultations or surveys).
4. The data will not be used for any purposes other than the performance of the activities specified above. Otherwise you will be informed accordingly.

### ► Legal basis of the processing of personal data and/or contractual or other obligation imposing it

5. The legal basis for this processing operation are the following :
  - Regulation (EU) 1094/2010, and notably Articles 8, 10, 15, 16, 16a, 29 and 71 thereof
  - EIOPA's Public Statement on Public Consultations
  - EIOPA's Handbook on Public Consultations

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<sup>8</sup> Regulation (EU) 2018/1725 of the European Parliament and of 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, p. 39–98.

<sup>9</sup> For more information on the processing of personal data in EUSurvey, please see the [dedicated privacy statement](#).

6. In addition, in accordance with Article 5(1)(a) of the Regulation, processing is lawful as it is necessary for the performance of a task carried out in the public interest.

► **Controller of the personal data processing**

7. The (internal) controller responsible for the processing of personal data is the Head of EIOPA's Risks and Financial Stability Department.

8. Address and email address of the controller:

Westhafen Tower, Westhafenplatz 1  
60327 Frankfurt am Main  
Germany  
[DataController@eiopa.europa.eu](mailto:DataController@eiopa.europa.eu)

► **Contact detail of EIOPA's Data Protection Officer (DPO)**

9. Westhafenplatz 1, 60327 Frankfurt am Main, Germany  
[dpo@eiopa.europa.eu](mailto:dpo@eiopa.europa.eu)

► **Types of personal data collected**

10. The following personal data might be processed:
- Contact details (name, email address, phone number).
  - Employment details (company and job title).

► **Recipients/processors of the personal data collected**

11. Data will be collected and disclosed to the relevant staff members part of the Department/Unit in charge of the consultation/surveys and also to other EIOPA's staff on a need-to-know basis (e.g IT staff, security officer).

► **Retention period**

12. Personal data collected are kept by until the finalisation of the project the public consultation or the survey relate to.
13. The personal data collected in EUSurvey are deleted from EUSurvey as soon as the period to provide answers elapsed.

► **Transfer of personal data to a third country or international organisations**

14. No personal data will be transferred to a third country or international organisation. The service provider is located in the European Union.

► **Automated decision-making**

15. No automated decision-making including profiling is performed in the context of this processing operation.

► **What are the rights of the data subject?**

16. Data subjects have the right to access their personal data, receive a copy of them in a structured and machine-readable format or have them directly transmitted to another controller, as well as request their rectification or update in case they are not accurate. Data subjects also have the right to request the erasure of their personal data, as well as object to or obtain the restriction of their processing.

17. Where processing is based solely on the consent, data subjects have the right to withdraw their consent to the processing of their personal data at any time.

18. Restrictions of certain rights of the data subject may apply, in accordance with Article 25 of Regulation (EU) 2018/1725.

19. For the protection of the data subjects' privacy and security, every reasonable step shall be taken to ensure that their identity is verified before granting access, or rectification, or deletion.

20. Should the data subjects wish to exercise any of the rights provided in paragraphs 16 and 17 above, please contact EIOPA's DPO ([dpo@eiopa.europa.eu](mailto:dpo@eiopa.europa.eu)).

► **Who to contact if the data subjects have any questions or complaints regarding data protection?**

21. Any questions or complaints concerning the processing of the personal data can be addressed to the internal Data Controller ([DataController@eiopa.europa.eu](mailto:DataController@eiopa.europa.eu)) or EIOPA's DPO ([dpo@eiopa.europa.eu](mailto:dpo@eiopa.europa.eu)).

22. Alternatively, the data subjects can have recourse to the **European Data Protection Supervisor** ([www.edps.europa.eu](http://www.edps.europa.eu)) at any time, as provided in Article 63 of the Regulation.