

# REGISTER OF PROCESSING ACTIVITIES



Legal documentation  
European Data Protection Regulation

Version 6  
March 2026

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# 1 PURPOSE OF THE DOCUMENT

## 1.1 Introduction

The main purpose of this document is to create the register of processing activities in accordance with the provisions of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL - of 27 April 2016 - on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter GDPR).

Article 30 of the GDPR provides for the obligation to create a register of processing activities for controllers who collect information containing personal data.

### *Recording of processing activities*

*1. Each controller and, where applicable, his or her representative shall keep a register of the processing activities carried out under his or her responsibility. That register shall contain all the information set out below:*

*(a) the name and contact details of the controller and, where applicable, the joint controller, the controller's representative, and the data protection officer;*

*(b) the purposes of the processing;*

*(c) a description of the categories of data subjects and categories of personal data;*

*(d) the categories of recipients to whom the personal data were or will be disclosed, including recipients in third countries or international organisations;*

*(e) where applicable, transfers of personal data to a third country or an international organisation, including the identification of that third country or international organisation and, in the case of transfers referred to in the second subparagraph of Article 49(1), documentation of appropriate safeguards;*

*(g) where possible, a general description of the technical and organisational security measures referred to in Article 32(1).*

*[...]*

*5. The obligations referred to in paragraphs 1 and 2 shall not apply to any undertaking or organisation employing fewer than 250 persons, unless the processing carried out by it is likely to result in a risk to the rights and freedoms of data subjects, is not occasional, or involves special categories of personal data referred to in Article 9(1) or personal data relating to criminal convictions and offences referred to in Article 10.*

Thus, the following section defines the specific data that are processed and collected according to the processing activities previously analysed and detected in the organisation.

## 2 RECORD OF TREATMENT ACTIVITIES

### 2.1 Personnel management

ADDITIONAL INFORMATION ON DATA PROTECTION	
Data controller and contact person responsible for data protection	<p>Health Systems Research Institute Association - Biosistemak</p> <p>B Accelerator Tower (BAT) Gran Vía, 1 48001 Bilbao, Bizkaia. Telephone: 944007790</p> <p>Contact Data Protection Delegate: dpo-dpd@bio-sistemak.eus</p>
Purposes of processing and storage periods	<p>Human resources and payroll management, for the execution of the employment relationship.</p> <p>The data will be kept for the duration of the employment relationship and after termination of the employment relationship, the data will be kept until possible liabilities are addressed.</p> <p>The financial data of this processing activity shall be kept in accordance with the provisions of Provincial Law 2/2005, of 10 March, on the General Taxation of the Historical Territory of Biscay.</p>
Legal basis for processing	<p>The processing is necessary for the performance of a contract to which the data subject is a party (employment contract).</p> <p>The processing is necessary in order to comply with a legal obligation applicable to the data controller: labour regulations (Royal Legislative Decree 2/2015, of 23 October, approving the revised text of the Workers' Statute Law, Royal Legislative Decree 8/2015, of 30 October, approving the revised text of the General Social Security Law) and Tax regulations (Provincial Regulation 2/2005, of 10 March, General Tax Regulation of the Historical Territory of Biscay).</p>

## ADDITIONAL INFORMATION ON DATA PROTECTION

<p>Recipients</p>	<p>Personal data may be communicated to the Mutual Accident Insurance Company, the SEPE, the Provincial Treasury of Bizkaia, the Courts and Tribunals, the Social Security and Financial Institutions.</p>
<p>Exercise of rights</p>	<p>The interested party has the right to access, rectify, delete, limit or oppose the processing and portability of their data by sending a written communication to the organisation's address, including a document accrediting their identity, or to the e-mail address <a href="mailto:dpo-dpd@bio-sistemak.eus">dpo-dpd@bio-sistemak.eus</a>. You also have the right to seek the protection of the Spanish Data Protection Agency.</p>

## 2.2 Administrative management

ADDITIONAL INFORMATION ON DATA PROTECTION	
Data controller and contact person responsible for data protection	<p>Health Systems Research Institute Association - Biosistemak</p> <p>B Accelerator Tower (BAT) Gran Vía, 1 48001 Bilbao, Bizkaia. Telephone: 944007790</p> <p>Contact Data Protection Delegate: dpo-dpd@bio-sistemak.eus</p>
Purposes of processing and storage periods	<p>Administrative, fiscal and economic management of the entity.</p> <p>The data will be kept for the duration of the employment relationship and after termination of the employment relationship, the data will be kept until possible liabilities are addressed.</p> <p>The financial data of this processing activity shall be kept in accordance with the provisions of Provincial Law 2/2005, of 10 March, on the General Taxation of the Historical Territory of Biscay.</p>
Legal basis for processing	<p>The processing is necessary for the performance of a contract to which the data subject is party (contracts with suppliers).</p> <p>The processing is necessary in order to comply with a legal obligation applicable to the data controller: (Norma Foral 2/2005, of 10 March, General Taxation of the Historical Territory of Biscay, Norma Foral 7/1994, of 9 November, on Value Added Tax).</p> <p>The processing is necessary for the purposes of the legitimate interests pursued by the controller: keeping a register of usual suppliers and creditors and their contact persons.</p>
Recipients	<p>Personal data may be communicated to the Treasury of Bizkaia, Courts and Tribunals and Financial Entities Economic-Financial: Invoice economic data, means of payment.</p>

## ADDITIONAL INFORMATION ON DATA PROTECTION

### Exercise of rights

The interested party has the right to access, rectify, delete, limit or oppose the processing and portability of their data by sending a written communication to the organisation's address, including a document accrediting their identity, or to the e-mail address [dpo-dpd@bio-sistemak.eus](mailto:dpo-dpd@bio-sistemak.eus). You also have the right to seek the protection of the Spanish Data Protection Agency.

## 2.3 Selection processes

ADDITIONAL INFORMATION ON DATA PROTECTION	
Data controller and contact person responsible for data protection	<p>Health Systems Research Institute Association - Biosistemak</p> <p>B Accelerator Tower (BAT) Gran Vía, 1 48001 Bilbao, Bizkaia. Telephone: 944007790</p> <p>Contact Data Protection Delegate: dpo-dpd@bio-sistemak.eus</p>
Purposes of processing and storage periods	<p>Management of the selection processes for candidates to work in the entity.</p> <p>The data will be kept for the duration of the selection process and thereafter for up to one year.</p>
Legal basis for processing	The data subject consented to the processing of his or her personal data for this purpose.
Recipients	The data will not be communicated to third parties, except for compliance with any legal obligation.
Exercise of rights	The interested party has the right of access, rectification, deletion of their data, and limitation, opposition to its processing and portability by sending a written communication to the address of the entity, including a document accrediting their identity or to the e-mail address dpo-dpd@bio-sistemak.eus. You also have the possibility of withdrawing your consent by the means indicated above. Finally, you also have the right to seek the protection of the Spanish Data Protection Agency.

## 2.4 Research projects

ADDITIONAL INFORMATION ON DATA PROTECTION	
Name and contact details of the controller and, where applicable, of the joint controller, of the controller's representative, and of the data protection officer	<p>Health Systems Research Institute Association - Biosistemak</p> <p>B Accelerator Tower (BAT) Gran Vía, 1 48001 Bilbao, Bizkaia. Telephone: 944007790</p> <p>E-mail: josemaria.aguirreurcelay@bio-sistemak.eus</p> <p>VAT N°: G95646014</p> <p>Contact Data Protection Delegate: dpo-dpd@bio-sistemak.eus</p>
Purposes of treatment	Health research in the general area of health.
Legal basis for processing	<p>GDPR: 6.1. a) the data subject gave his or her consent to the processing of his or her personal data for one or more specified purposes.</p> <p>GDPR: 9.2. j) the processing is necessary for the purposes of scientific research in accordance with Article 89(1).</p> <p>Seventeenth additional provision of the LOPDG.</p>
Description of the categories or groups of stakeholders	<p>Interested persons</p> <p>Contact persons</p>
Categories of personal data	<p>Identifiers: name and surname, e-mail, signature, telephone number.</p> <p>Personal characteristics: place of birth</p> <p>Social circumstances</p> <p>Academics and professionals</p> <p>Job details</p> <p>Special categories of data: health data</p>
Categories of recipients to whom the personal data	

## ADDITIONAL INFORMATION ON DATA PROTECTION

were or will be disclosed, including recipients in third countries or international organisations	Not detected
Where possible, the deadlines foreseen for the deletion of the different categories of data;	The data will be processed during the research activity of the project.
Where possible, a general description of technical and organisational security measures	Appropriate security measures shall be taken.
Origin of the data (if they originate from persons other than the data subject)	From the person concerned.
International data transfers	No international transfers of data are foreseen.

## 2.5 Management of research groups

ADDITIONAL INFORMATION ON DATA PROTECTION	
Data controller and contact person responsible for data protection	<p>Association Health Systems Research Institute - Biosistemak</p> <p>B Accelerator Tower (BAT) Gran Vía, 1 48001 Bilbao, Bizkaia. Telephone: 944007790</p> <p>Contact Data Protection Delegate: dpo-dpd@bio-sistemak.eus</p>
Purposes of processing and storage periods	<p>Management and administration of the Biosistemak Research Groups.</p> <p>The data will be kept until the data subject objects or withdraws his or her consent.</p>
Legal basis for processing	The data subject consented to the processing of his or her personal data for this purpose.
Recipients	The data can be made available to the other participants of the Research Groups.
Exercise of rights	The interested party has the right of access, rectification, deletion of their data, and limitation, opposition to its processing and portability by sending a written communication to the address of the entity, including a document accrediting their identity or to the e-mail address dpo-dpd@bio-sistemak.eus. You also have the possibility of withdrawing your consent by the means indicated above. Finally, you also have the right to seek the protection of the Spanish Data Protection Agency.

## 2.6 Collaborating Persons

CATEGORY	IDENTIFICATION
Name and contact details of the controller and, where applicable, of the joint controller, of the controller's representative, and of the data protection officer	<p>Health Systems Research Institute Association – Biosistemak</p> <p>VAT N°: G95646014</p> <p>B Accelerator Tower (BAT) Gran Vía, 1 48001 Bilbao, Bizkaia. Telephone: 944007790</p> <p>Contact Data Protection Delegate: dpo-dpd@bio-sistemak.eus</p>
Purposes and legitimacy of the processing	<p>Management and administration of the people who collaborate with the Association. The legitimacy of the processing lies in the fact that the data subject has given his consent to the processing of his personal data for this purpose.</p>
Description of stakeholder categories	<ul style="list-style-type: none"> <li>▪ People who collaborate with the Association.</li> </ul>
Categories of personal data	<ul style="list-style-type: none"> <li>▪ Identifying information: Name and surname, e-mail, DNI/NIF/NIE, telephone, signature</li> <li>▪ Academic and professional: Education, qualifications</li> <li>▪ Job Details: Workplace and Work History</li> </ul>
Categories of recipients to whom the personal data were or will be disclosed, including recipients in third countries or international organisations	<ul style="list-style-type: none"> <li>▪ Other participants in the research groups</li> </ul>
Where possible, the deadlines foreseen for the erasure of the different categories of data	<p>The data will be kept until the data subject objects or withdraws his or her consent.</p>
Where possible, a general description of technical and	

CATEGORY		IDENTIFICATION
organisational measures	security	Security policies in the processing of personal data.

## 2.7 Internal Information System

CATEGORY	IDENTIFICATION
Name and contact details of the controller and, where applicable, of the joint controller, of the controller's representative, and of the data protection officer	<p>Health Systems Research Institute Association - Biosistemak</p> <p>VAT N<sup>o</sup>: G95646014</p> <p>B Accelerator Tower (BAT) Gran Vía, 1 48001 Bilbao, Bizkaia. Telephone: 944007790</p> <p>Contact Data Protection Delegate: dpo-dpd@bio-sistemak.eus</p>
Purposes and legitimacy of the processing	<p>Management of the information received in accordance with the criteria of Law 2/2023 of 20 February on the protection of persons who report regulatory infringements and the fight against corruption.</p> <p>The processing is legitimised by Article 6(1)(e) of the GDPR, in accordance with Article 30(2) of Law 2/2023.</p>
Description of stakeholder categories	<ul style="list-style-type: none"> <li>▪ Reporting persons</li> <li>▪ Reported persons</li> <li>▪ Responsible for the Internal Information System</li> <li>▪ Collaborators of the person in charge</li> </ul>
Categories of personal data	<ul style="list-style-type: none"> <li>▪ Identifying information: Name and surname, e-mail, DNI/NIF/NIE, telephone, signature</li> <li>▪ Data relating to the facts reported</li> </ul>
Categories of recipients to whom the personal data were or will be disclosed, including recipients in third countries or international organisations	<ul style="list-style-type: none"> <li>▪ State Security Forces and Corps</li> <li>▪ Competent administrative bodies</li> <li>▪ Public Prosecutor's Office, Courts and Tribunals</li> </ul>

CATEGORY	IDENTIFICATION
<p>Where possible, the deadlines foreseen for the erasure of the different categories of data</p>	<p>Only for the time necessary to decide whether to initiate an investigation into the reported facts, as provided for in Article 32 of Law 2/2023.</p>
<p>Where possible, a general description of technical and organisational security measures</p>	<p>Security policies in the processing of personal data.</p>

## 2.8 Institutional Promotion

CATEGORY	IDENTIFICATION
Name and contact details of the controller and, where applicable, of the joint controller, of the controller's representative, and of the data protection officer	<p>Health Systems Research Institute Association - Biosistemak</p> <p>VAT N<sup>o</sup>: G95646014</p> <p>B Accelerator Tower (BAT) Gran Vía, 1 48001 Bilbao, Bizkaia. Telephone: 944007790</p> <p>Contact Data Protection Delegate: dpo-dpd@bio-sistemak.eus</p>
Purposes and legitimacy of the processing	To manage the information to promote the activity carried out by the Association. The legitimacy of the processing lies in the fact that the data subject has given his consent to the processing of his personal data for this purpose.
Description of stakeholder categories	<ul style="list-style-type: none"> <li>Persons consenting to participate in promotional activities</li> </ul>
Categories of personal data	<ul style="list-style-type: none"> <li>Identification: Name and surname, e-mail, DNI/NIF/NIE, telephone, signature. Image/voice</li> </ul>
Categories of recipients to whom the personal data were or will be disclosed, including recipients in third countries or international organisations	<ul style="list-style-type: none"> <li>Advertising, dissemination and promotional activities.</li> <li>Social networking.</li> </ul>
Where possible, the deadlines foreseen for the erasure of the different categories of data	The data will be kept until the data subject objects or withdraws his or her consent.
Where possible, a general description of technical and organisational security measures	Security policies in the processing of personal data.

## 2.9 Event Management

CATEGORY	IDENTIFICATION
Name and contact details of the controller and, where applicable, of the co-responsible person, the controller's representative and the data protection officer at.	<p>Health Systems Research Institute Association - Biosistemak</p> <p>VAT N°: G95646014</p> <p>B Accelerator Tower (BAT) Gran Vía, 1. 48001 Bilbao (Bizkaia). Telephone: 944007790</p> <p>Contact Data Protection Delegate: dpo-dpd@biosistemak.eus</p>
Purposes and legitimacy of the processing	Manage the information for the complete management of events, including menus, as well as participants and speakers.
Description of stakeholder categories	<ul style="list-style-type: none"> <li>Persons giving permission to participate in the events</li> </ul>
Categories of personal data	<ul style="list-style-type: none"> <li>Identity: Name and surname, e-mail, DNI/NIF/NIE, telephone, signature. Image/voice</li> <li>Health data: menus</li> </ul>
Categories of recipients to whom the personal data were or will be disclosed, including recipients in third countries or international organisations	<ul style="list-style-type: none"> <li>Advertising, dissemination and promotional activities.</li> <li>Social networking.</li> </ul>
Where possible, the deadlines foreseen for the erasure of the different categories of data	The data will be kept until the data subject objects or withdraws his or her consent.
Where possible, a general description of technical and organisational security measures	Security policies in the processing of personal data