

CONSULTATION  
PAPER

## CONSULTATION PAPER

on the proposal for Regulatory Technical Standards on factors for identifying undertakings under dominant or significant influence and undertakings managed on a unified basis

EIOPA-BoS-24/323  
1 October 2024

# TABLE OF CONTENTS

Responding to this paper	3
1. Background and rationale	5
2. Draft Technical Standards	7
Annex: Impact Assessment	13

## RESPONDING TO THIS PAPER

EIOPA welcomes comments on the consultation paper on the proposal for Regulatory Technical Standards on factors for identifying undertakings under dominant or significant influence and undertakings managed on a unified basis.

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 provide your comments to EIOPA via EU Survey ([link](#)) by 2 January 2025 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 [Solvencyllreview@eiopa.europa.eu](mailto:Solvencyllreview@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Please note that personal contact details (such as name of individuals, email addresses and phone numbers) will not be published.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.

---

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

### 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. BACKGROUND AND RATIONALE

## AMENDMENTS TO THE SOLVENCY II DIRECTIVE

The European Commission proposed amendments to Directive 2009/138/EC<sup>2</sup> (Solvency II Directive) in September 2021<sup>3</sup>. The provisional agreement of the European co-legislators on the amendments to the Solvency II Directive<sup>4</sup> changes Article 212 to facilitate the identification of undertakings which form a group, in particular with respect to groups which are not in the scope of Directive 2013/34/EU and horizontal groups, with no or weak capital links between undertakings in particular where holdings are kept below thresholds for treatment as a qualifying holding or participation.

Supervisory authorities should identify the existence of a group on the basis of the factors listed in Article 212(4) of the Solvency II Directive.

## MANDATE FOR DRAFT REGULATORY TECHNICAL STANDARDS

In accordance with Article 212(5) of the Solvency II Directive, the Regulatory Technical Standards (RTS) shall supplement or specify the factors that supervisory authorities shall consider identifying dominant or significant influence of a natural person or undertaking over another undertaking including where this influence is exercised through centralised coordination over the decisions of the other undertaking, and undertakings managed on a unified basis.

## APPROACH TO THE RTS

The comprehensive list of supporting evidence laid down in this RTS is not limited to the identification of direct holdings in insurance and reinsurance undertakings but covers all undertakings that are or can be part of a group. This encompasses any undertaking linked to each other by a relationship of dominant and significant influence including by means of coordination and undertakings managed on a unified basis.

The factors identified in Article 212(4) points (a) to (d) are specified in Articles 1 to 4 of the RTS, respectively.

Supervisory authorities should consider factors and supporting evidence, individually and in combination, taking into account their significance, continuity and consistency. Not all factors and supporting evidence are required to be met for identifying dominant or significant influence of a natural person or undertaking over another undertaking or undertakings managed on a unified basis. Factors should be considered by the supervisory authorities based on evidence.

---

<sup>2</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. 1–155

<sup>3</sup> [Proposal for a Directive of the European Parliament and of the Council amending Directive 2009/138/EC as regards proportionality, quality of supervision, reporting, long-term guarantee measures, macro-prudential tools, sustainability risks, group and cross-border supervision](#)

<sup>4</sup> See the [corrigendum of the text of the provisional agreement as adopted by the European Parliament on 23 April 2024](#).

Where there are no contractual arrangements, or where contractual arrangements do not provide enough clarity to reach a conclusion over the relationship between a natural person or an undertaking and another undertaking, supervisory authorities should consider in a proportionate manner other material evidence regarding ability to influence decisions (Article 1), dependencies (Article 2) and coordination (Articles 3 and 4).

Where on the basis of that evidence, a supervisory authority considers that an undertaking is a parent undertaking of another undertaking because it effectively exercises a dominant or significant influence over that undertaking or where a supervisory authority determines that two or more undertakings are managed on a unified basis, that supervisory authority can determine, after consulting the other supervisory authorities concerned and the group itself, the proportional share which shall be taken into account for the purposes of Article 221 of the Solvency II Directive.

The supervisory authorities shall provide a detailed explanation of the factors on which the identification was made to the designated parent undertaking in accordance with Article 212(5) of the Solvency II Directive.

The draft RTS includes inter alia the elements from paragraph 1.17 of Guideline 1 of the “EIOPA Guidelines on treatment of related undertakings, including participations”<sup>5</sup> related to the identification of dominant or significant influence.

---

<sup>5</sup> [EIOPA Guidelines on treatment of related undertakings, including participations](#)

## 2. DRAFT TECHNICAL STANDARDS



EUROPEAN COMMISSION

Brussels, dd.mm.yyyy  
C(20..) yyy final

**COMMISSION DELEGATED REGULATION (EU) No .../..**

**of [ ]**

**COMMISSION DELEGATED REGULATION (EU) No .../... supplementing Directive  
2009/138/EC of the European Parliament and of the Council with regard to regulatory technical  
standards on factors for identifying undertakings under dominant or significant influence and  
undertakings managed on a unified basis**

of [ ]

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to 2009/138/EC of 25 November 2009 of the European Parliament and of the Council on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II) <sup>(1)</sup> and in particular Article 212(5), third subparagraph, thereof

Whereas:

- (1) This Regulation provides lists of supporting evidence which specify the factors that supervisory authorities should consider for identifying dominant or significant influence of a natural person or undertaking over another undertaking including where this influence is exercised through centralised coordination over the decisions of the other undertaking and undertakings managed on a unified basis.
- (2) In order to ensure consistency on the identification of the relationships, the factors and supporting evidence laid down in this Regulation are not limited to the assessment of holdings in insurance or reinsurance undertakings and they should cover the assessment of relationships of any entities that are or can be part of a group.
- (3) To identify the relationships, not all factors and supporting evidence listed in this Regulation need to be fulfilled. Supervisory authorities need to consider the significance, continuity and consistency of the relevant evidence.
- (4) The existence of contractual arrangements is the first element of evidence to be considered. When those are missing or do not provide enough clarity to reach a conclusion over a relationship, supervisory authorities should consider other evidence.
- (5) To identify if a natural person or undertaking exercises dominant or significant influence over another undertaking, supervisory authorities should consider if that natural person or undertaking has the ability to influence decisions with impact on the financial and solvency position of the other undertaking, how they are exposed to losses or benefits from the involvement with that undertaking and the level of dependence of that undertaking's operations on that natural person or undertaking.
- (6) The identification of coordination between two or more undertakings should be considered by supervisory authorities as part of the overall analysis of a relationship between at least two undertakings independently from the type of undertakings involved, their location or organisational structure.
- (7) To identify undertakings managed on a unified basis, supervisory authorities should consider all relevant relationships and interconnections between undertakings and any forms of coordination of strategies, operations or processes.



- (8) This Regulation is based on the draft regulatory technical standards submitted to the Commission by the European Insurance and Occupational Pensions Authority.
- (9) The European Insurance and Occupational Pensions Authority has conducted open public consultations on the draft regulatory technical standards on which this Regulation is based, analysed the potential related costs and benefits and requested the advice of the [...] Stakeholder Group established by Article 37 of Regulation (EU) No 1094/2010.

HAS ADOPTED THIS REGULATION:

*Article 1*

***Control or ability to influence decisions***

1. When identifying if a natural person or undertaking has the ability to influence decisions of another undertaking as referred to in Article 212(4)(a) of Directive 2009/138/EC, supervisory authorities shall consider the significance, continuity and consistency of any of the following evidence in addition to that referred in that Article:
- (a) evidence of contractual rights:
- (i) capital or voting rights including potential voting rights resulting from contractual arrangements, in particular from warrants, options, convertible instruments and other forward contracts;
  - (ii) contractual arrangements between the natural person or undertaking and vote holders or other entities that can influence decisions in the other undertaking;
  - (iii) membership rights, where the other undertaking is a mutual or mutual-type undertaking, and potential rights resulting from contractual arrangements;
- (b) other evidence:
- (i) ability, regardless of any contractual right, to influence the nomination process for electing members of the other undertaking's administrative, management or supervisory body, including the obtaining of proxies from other holders of voting rights;
  - (ii) ability, regardless of any contractual right, to appoint or approve persons who effectively run the other undertaking or are responsible for key, critical or important functions;
  - (iii) ability, regardless of any contractual right, to influence the other undertaking to enter into, or veto any changes to, significant transactions;
  - (iv) ability, regardless of any contractual right, to influence significant changes in the other undertaking's financial and solvency position or business model;
  - (v) members of the other undertaking's administrative, management or supervisory body, or the persons who effectively run that undertaking or are responsible for other key, critical or important functions in that undertaking are related parties to the natural person or undertaking in the meaning of the International Accounting Standard 24 adopted by Commission Regulation (EU) 2023/1803<sup>6</sup>;
  - (vi) members of the other undertaking's administrative, management or supervisory body, or the

---

<sup>6</sup> Commission Regulation (EU) 2023/1803 of 13 August 2023 adopting certain international accounting standards in accordance with Regulation (EC) No 1606/2002 of the European Parliament and of the Council (OJ L 237, 26.9.2023, p. 1).

persons who effectively run that undertaking or are responsible for key, critical or important functions in that undertaking are current or previous employees of the natural person or undertaking.

## *Article 2*

### ***Strong reliance on an undertaking or natural person***

When identifying strong reliance on an undertaking or natural person as referred to in Article 212(4)(b) of Directive 2009/138/EC, supervisory authorities shall consider the significance, continuity and consistency of any of the following transactions with the natural person or undertaking, in addition to the evidence referred to in that Article, where those transactions significantly impact the business model or solvency and financial position of the other undertaking:

- (a) financing transactions including by means of subordinated liabilities, equity, cost-sharing, tax arrangement, debt transfer agreement, securities lending or repurchase agreement, loans or any other kind of financing arrangement and off-balance sheet solidarity agreement;
- (b) guarantee of a significant portion of obligations;
- (c) reinsurance;
- (d) outsourcing, as referred to in Article 212(4)(b) of Directive 2009/138/EC including outsourcing of key, critical or important operational functions or activities;
- (e) sharing of any technical or operational functions or activities such as hardwares or softwares, information system or any employees;
- (f) sharing of a brand, pricing, claims handling, service providers, distribution channels, communication or marketing;
- (g) the provision of essential technical information to the other undertaking.

## *Article 3*

### ***Coordination of financial or investment decisions***

When identifying evidence of coordination of financial or investment decisions as referred to in Article 212(4)(c) of Directive 2009/138/EC between at least two undertakings, supervisory authorities shall consider the significance, continuity and consistency of any of the following evidence in addition to that referred in that Article:

- (a) decision-making bodies including committees within which personnel from those undertakings work together and decide about group policies or are composed by persons designated by the group;
- (b) links between the persons responsible for the key, critical or important functions of those undertakings;
- (c) rotation of key personnel between those undertakings including members of the administrative, management or supervisory body and persons responsible for key, critical or important functions;
- (d) one person being responsible for a key, critical or important function within all those undertakings;
- (e) same shareholders' representative at the general assemblies of those undertakings and joint proposal of decisions;
- (f) similar investment strategies or risk exposures of those undertakings;
- (g) similar or coordinated representation and feedback of those undertakings to the supervisory authorities.

*Article 4*

***Coordinated and consistent strategies, operations or processes***

1. When identifying evidence of coordinated and consistent strategies, operations or processes in accordance with Article 212(4)(d) of Directive 2009/138/EC between at least two undertakings, supervisory authorities shall consider the significance, continuity and consistency of the following evidence, in addition to that referred in that Article:
  - (a) any contractual arrangements or memoranda or articles of association;
  - (b) other material evidence:
    - (i) similar strategies, pricing, claims handling, reserving and service providers between those undertakings;
    - (ii) same natural persons or undertakings exercising, directly or indirectly influence on those undertakings;
    - (iii) same shareholders' representative at the general assemblies of those undertakings and joint proposal of decisions;
    - (iv) direct or indirect links between the decision-making bodies of those undertakings, including the same members of the administrative, management or supervisory body, the same persons who effectively run the undertaking or are responsible for key, critical or important functions, or where personnel of one undertaking are related parties in the meaning of the International Accounting Standard 24 adopted by Commission Regulation (EU) 2023/1803 or previous employees from the other undertaking or from related entities;
    - (v) similar investment strategies or risk exposures of those undertakings;
    - (vi) similar policies including a similar and coordinated dividend distribution policy of those undertakings;
    - (vii) similar risk management or internal control system including sharing of staff between those undertakings;
    - (viii) similar outsourcing arrangements between those undertakings or with entities with close links to those undertakings;
    - (ix) same or shared physical location of the head office of those undertakings or shared properties;
    - (x) similar or coordinated representation and feedback of those undertakings to the supervisory authorities.

*Article 5*

**Entry into force**

This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

*[For the Commission*

*The President]*

*[For the Commission*

*On behalf of the President]*

*[Position]*

## ANNEX: IMPACT ASSESSMENT

### OBJECTIVES

In accordance with Article 29 of the EIOPA Regulation<sup>7</sup>, EIOPA carries out, where relevant, analyses of costs and benefits during the policy development process. The analysis of costs and benefits is undertaken according to an impact assessment methodology.

This impact assessment covers the EIOPA draft RTS on factors for identifying undertakings under dominant or significant influence and undertakings managed on a unified basis. It is based on a qualitative assessment done by EIOPA.

This draft RTS aims at providing a more harmonised EU framework by specifying the factors supervisory authorities have to consider when identifying dominant or significant influence of a natural person or undertaking over another undertaking including where this influence is exercised through centralised coordination over the decisions of the other undertaking, and undertakings managed on a unified basis.

In drafting this RTS, EIOPA sticks to the general objectives of the Solvency II Directive, as agreed by the legislators in 2009. These general objectives are:

- ▶ adequate protection of policyholders and beneficiaries, being the main objective of supervision;
- ▶ financial stability;
- ▶ proper functioning of the internal market.

In view of the specific purpose of this draft RTS, the following more specific objectives were identified:

- ▶ effective and efficient supervision of insurance and reinsurance undertakings and groups;
- ▶ ensuring a level playing field through sufficiently harmonised rules.

### POLICY ISSUES

#### POLICY ISSUE A: MANDATORY CONSIDERATION OF ALL EVIDENCE IDENTIFIED IN THE RTS

Where contractual arrangements do not provide enough clarity to reach a conclusion over the relationship between a natural person or undertaking and another undertaking, the draft RTS specifies other evidence to be considered by supervisory authorities. This policy issue considers the need for

---

<sup>7</sup> Regulation (EU) No 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.

supervisory authorities considering all possible sources of evidence specified in the draft RTS or the possibility of supervisory authorities adopting a proportionate approach based on the characteristics of the corporate structure.

## **POLICY OPTIONS**

### **POLICY ISSUE A: MANDATORY CONSIDERATION OF ALL EVIDENCE IDENTIFIED IN THE RTS**

#### **Policy option A.0: No change**

This option means that no RTS are in place. It is a hypothetical baseline that is only introduced as a benchmark against which the impact of the other policy options is compared.

Under option A.0, the factors defined in paragraph 4 of Article 212 the Solvency II Directive and Guideline 1 paragraph 1.17 of the EIOPA Guidelines on treatment of related undertaking including participations are considered sufficient to identify the relationships between at least two undertakings referred to in paragraphs 2 and 3 of Article 212 the Solvency II Directive by supervisory authorities.

This option is not considered as a viable option given the specific mandate to EIOPA in Article 212(5) of the Solvency II Directive.

#### **Policy option A.1: Supervisory authorities are required to consider all evidence identified in the RTS**

Under option A.1, supervisory authorities shall check all the factors and possible sources of evidence specified in the draft RTS regardless of the characteristics of the corporate structure.

Option A.1 provides for a fully harmonised approach, where all supervisory authorities would follow the same checks. However, depending on the characteristics of the corporate structure, some checks could be non-proportionate for the objective to be achieved, e.g. verify all service providers to assess evidence of coordinated and consistent strategies, operations or processes. As a result, having the same checks for all undertakings, regardless of the characteristics of the specific structures, could put an excessive burden on both the industry and the supervisory authorities.

#### **Policy option A.2: Supervisory authorities are not required to consider all evidence identified in the RTS**

Under option A.2., supervisory authorities can decide which checks are suitable on a case-by-case basis. While these may reduce the burden in some cases, where the checks are unduly cumbersome, it risks creating different supervisory practices across jurisdictions.

## **IMPACT OF THE POLICY OPTIONS**

POLICY ISSUE A: MANDATORY CONSIDERATION OF ALL EVIDENCE IDENTIFIED IN THE RTS

**Policy option A.0: No change**

The current Level 1 and Level 3 texts are considered sufficient guidance to ensure convergence on the identification of a relationship between at least two undertakings referred to in paragraphs 2 and 3 of Article 212 the Solvency II Directive.

Policy option A.0		
<b>Costs</b>	Policyholders	Risks to policyholder protection due to potential lack of guidance on the identification of relationships leading to lack or poor group supervision.
	Industry	Risk of different supervisory practices across jurisdictions.
	Supervisors	Different supervisory practices across jurisdictions.
	Other	No material impact.
<b>Benefits</b>	Policyholders	No material impact.
	Industry	Neutral impact. Industry applies the rules in the Directive.
	Supervisors	No benefits as supervisors will continue facing uncertainties.
	Other	No material impact.

**Policy option A.1: Supervisory authorities are required to consider all evidence identified in the RTS**

Supervisory authorities shall check all the evidence specified in the draft RTS regardless of the characteristics of the corporate structure.

Policy option A.1		
<b>Costs</b>	Policyholders	No material impact.
	Industry	Eventual burden if factors and circumstances are burdensome and not relevant.
	Supervisors	Eventual burden if factors and circumstances are burdensome and not relevant.
	Other	No material impact.
<b>Benefits</b>	Policyholders	No material impact.
	Industry	Harmonised supervisory practices across jurisdictions.
	Supervisors	Harmonised supervisory practices across jurisdictions.
	Other	No material impact.

**Policy option A.2: Supervisory authorities are not required to consider all evidence identified in the RTS**

Supervisory authorities shall decide which checks are suitable on a case-by-case basis.

Policy option A.2		
<b>Costs</b>	Policyholders	No material impact.
	Industry	Risk of different supervisory practices across jurisdictions.
	Supervisors	Different supervisory practices across jurisdictions.
	Other	No material impact.
<b>Benefits</b>	Policyholders	No material impact.
	Industry	Proportional approach as undertakings are only required to provide information on specific evidence considered relevant by the supervisors.
	Supervisors	Proportional approach as supervisors have discretion to check only the evidence considered relevant.
	Other	No material impact.

**COMPARISON OF POLICY OPTIONS**

The effectiveness and efficiency of the different policy options are compared in the following tables.

**POLICY ISSUE A: MANDATORY CONSIDERATION OF ALL EVIDENCE IDENTIFIED IN THE RTS**

EFFECTIVENESS (0,+,,++)		
	Effective group supervision	Ensuring a level playing field
Policy option A.0: No change	0	0
Policy option A.1: Supervisory authorities are required to consider all evidence	++	++
Policy option A.2: Supervisory authorities are not required to consider all evidence	++	+
EFFICIENCY (0,+,,++)		
	Effective group supervision	Ensuring a level playing field
Policy option A.0: No change	0	0



Policy option A.1: Supervisory authorities are required to consider all evidence	+	+
Policy option A.2: Supervisory authorities are not required to consider all evidence	++	++

## PREFERRED OPTION

Policy option A.2, compared to policy option A.1, allows supervisory authorities to consider only the evidence relevant for each situation and not all of the evidence referred to in the RTS. Policy options A.1 and A.2 will result to similar outcomes in the identification of relationships between undertakings, nevertheless policy option A.2 will avoid an additional administrative burden both for supervisory authorities and the industry.

Therefore, policy option A.2 is the preferred option as the draft RTS enhances efficient group supervision and convergence while ensuring proportionality. This option allows supervisory authorities to adjust the application of the regulatory requirements to better focus and allocate resources to fulfil objectives of consumer protection and financial stability, while preventing overly burdensome and costly requirements on the industry that will be required to only provide evidence on the set of information requested by the supervisory authority.

## Privacy statement related to Public (online) Consultations

### Introduction

1. **EIOPA, as a European Authority, is committed to protect individuals with regard to the processing of their personal data in accordance with Regulation (EU) No 2018/1725 (further referred as the Regulation).<sup>8</sup>**

### Controller of the data processing

2. **The controller responsible for processing your data is EIOPA's Executive Director.**  
**Address and email address of the controller:**
3. **Westhafenplatz 1, 60327 Frankfurt am Main, Germany**  
**fausto.parente@eiopa.europa.eu**

### Contact details of EIOPA's Data Protection Officer

4. **Westhafenplatz 1, 60327 Frankfurt am Main, Germany**  
**dpo@eiopa.europa.eu**

### Purpose of processing your personal data

5. The purpose of processing personal data is to manage public consultations EIOPA launches and facilitate further communication with participating stakeholders (in particular when clarifications are needed on the information supplied).
6. Your 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 and/or contractual or other obligation imposing it

7. **EIOPA Regulation, and more precisely Article 10, 15 and 16 thereof.**
8. EIOPA's Public Statement on Public Consultations.

### Personal data collected

---

<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.

**9. The personal data processed might include:**

- Personal details (e.g. name, email address, phone number);
- Employment details.

**Recipients of your personal data**

**10. The personal data collected are disclosed to designated EIOPA staff members.**

**Transfer of personal data to a third country or international organisation**

**11. No personal data will be transferred to a third country or international organization.**

**Retention period**

**12. Personal data collected are kept until the finalisation of the project the public consultation relates to.**

**Profiling**

**13. No decision is taken in the context of this processing operation solely on the basis of automated means.**

**Your rights**

- 14. You have the right to access your 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.**
- 15. You have the right to request the erasure of your personal data, as well as object to or obtain the restriction of their processing.**
- 16. For the protection of your privacy and security, every reasonable step shall be taken to ensure that your identity is verified before granting access, or rectification, or deletion.**
- 17. Should you wish to access/rectify/delete your personal data, or receive a copy of them/have it transmitted to another controller, or object to/restrict their processing, please contact [legal@eiopa.europa.eu]**
- 18. Any complaint concerning the processing of your personal data can be addressed to EIOPA's Data Protection Officer (DPO@eiopa.europa.eu). Alternatively you can also have at any time recourse to the European Data Protection Supervisor (www.edps.europa.eu).**