

DECLARATION OF INTEREST

(by the Members of the EUDA Management Board (MB), including Members without voting rights, their Alternates and Observers)

First name: Pavel

Last name: Bém

Position in the EUDA MB:

- Member
- Member without voting rights
- Alternate
- Observer

I hereby declare, to the best of my knowledge, that the interests I currently have, or had in the five years preceding the date of this declaration, and which are, or could be perceived as, related to the EUDA's activities, are listed below:

- 1) Do you hold, or have you held in the past five years, positions in public or private organisation or entity (e.g., as employee, member of managing bodies), or do/did you perform professional activities (e.g., provision of services, consulting activities, liberal professions) which are, or could be perceived as, related to the EUDA's activities?

NO

YES *(please complete the table below as required)*

Position/activity	Organisation/entity	Time frame (from/to)	Observations
Psychiatrist, psychotherapist, family therapist	Centre for Psychotherapy and Family Therapy	1988 – 2023	
Head physician, psychiatris	SANANIM (Low Threshold Contact Centre)	2016 – 2023	
Executive Head	City of Prague Drug Council	since 2023	
Head of the department, psychiatrist, psychotherapist, facilitator in psychedelic assisted therapy, supervisor, teacher, trainer	Department of Addictology, First Medical Faculty, Charles University, Prague	since 1988	
Commissioner	Global Commission on Drug Policy	since 2013	
Commissioner	Eastern and Central European and Central Asian Commission on Drug Policy	since 2021	
EHRA Advisory Board Member	Eurasian Harm Reduction Association	since 2016	

- 2) Do you have, or did you have in the past five years, financial interests (e.g., managerial stakes in companies, including ownerships of patents or any other relevant intellectual property rights), or assets (shares and/or securities held in companies), or grants or other funding/financial benefits (e.g., sponsorships or other kinds of benefits received in a personal capacity) which are, or could be perceived as, related to the EUDA's activities?

NO

- YES (please complete the table below as required)

Financial interest/asset/grant/benefit	Organisation/entity	Time frame (from/to)	Observations

- 3) Does one of the situations referred to in items 1) and 2) above concern, or has it concerned in the past five years, your spouse/partner and/or your dependent family members?

NO

- YES (please complete the table below as required)

Family member's position/activity or financial interest/asset/grant/benefit	Organisation/entity	Time frame (from/to)	Observations

- 4) Do you have, or did you have in the past five years, any other relevant interests, other than the ones mentioned above, which are, or could be perceived as, related to the EUDA's activities?

NO

- YES (please complete the table below as required)

Other relevant interests	Organisation/entity	Time frame (from/to)	Observations

I undersigned declare on my honour that:

- To my best knowledge the present Declaration of interest is true and complete. I am aware that I will be responsible for updating this Declaration whenever the situation changes in respect of the interests declared and I will have the primary responsibility for spontaneously declaring any competing interest or conflicts of interest at all times, with special attention to any interest which might be considered prejudicial to my independence in relation to the items on the agenda of a meeting of any EUDA body that I have to attend.

- I have read and I am aware of the content of the Privacy statement on the protection of personal data resulting from this Declaration, as it is provided here below, and I am aware that this Declaration will be made available for public scrutiny on the EUDA website, with due respect to EU rules on protection of personal data.
- I am aware of and I shall comply with the EUDA Policy for the prevention and management of conflicts of interest as adopted by the EUDA Management Board at its meeting of 4 July 2024 (EUDA/26/24 as published on the EUDA website). In particular I am aware of and I shall comply with the following provisions of this Policy:
 - In order to fulfil its tasks, the EUDA needs to have access to the highest level of expertise available in the areas of activity covered by its mandate and mission, as defined in its Regulation. This expertise is often extremely specialised and the possible choice of alternative expertise is not always available. It is therefore essential that the EUDA can still be given access to specialised experts, while being made fully aware of all interests involved and possible risks of conflict of interests (or appearance of conflict of interests), in order to act upon these risks.
 - The need to avoid conflicts of interest should not prevent the EUDA from collaborating with and seeking input from high-level experts. As the persons concerned are generally experienced and may have interests arising out of their professional background and capacity, appearance of conflict of interest, cannot always be entirely avoided. The risks of actual or perceived conflicts of interest should be identified, evaluated and managed. This is particularly relevant in areas where available expertise is limited. A fair, proportionate and timely handling of each case should therefore be ensured pursuant to a policy on prevention and management of conflicts of interest which reflects the perceived exposure of the agency to the relevant risks, taking into account the tasks entrusted to it.
 - A conflict of interest generally refers to a situation where it can be reasonably considered that the impartiality and objectivity of an assessment, opinion, recommendation or decision of the agency is or might be perceived as being influenced, compromised or biased by a personal interest held or entrusted to a given individual. Relevant personal interest may be of financial or non-financial nature and it may concern a personal or family relationship or professional affiliations and other relevant outside activities.
 - Not only actual independence but also perception of independence is important, since this issue can impact on the agency's reputation by raising doubts about the conclusions reached. The appearance of conflict of interest can constitute a reputational risk to the agency, even if it turns out to be unsubstantiated.
 - This declaration of interest shall not imply by itself the existence of any conflict of interest. Declaring an interest shall not necessarily mean having an actual or potential conflict of interest, nor shall it automatically disqualify a person from participating in the activities of the EUDA.

Done at Prague on 3. 3. 2026

[Signed in original]

The published declaration of interest will read [Signed in original]. The original signed declaration of interest to be sent to the Management Board Secretariat, will be stored in line with the EU data protection rules for audit purposes.

Privacy statement on protection of personal data resulting from the Declaration of interest

The EUDA shall process any personal data resulting from any Declaration of interest delivered in accordance with the EUDA Policy for the prevention and management of conflicts of interest, hereinafter referred to as the 'Policy' (EUDA/26/24, as adopted by the EUDA Management Board at its meeting of 4 July 2024 and published on the EUDA website), pursuant to the 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.

1. Purpose of this data processing

The purpose of the data processing is to ensure and safeguard the impartial functioning and the independent operations of the EUDA and its bodies, in the public interest and in accordance with the mandate assigned to the latter.

2. Legal basis

The legal basis for this data processing is provided by the above-mentioned decision of the EUDA Management Board adopting the EUDA Policy for the prevention and management of conflicts of interest, as published on the EUDA website.

In particular this Policy defines the nature of the interests to be declared, the obligation to do so, the possible consequences of not declaring, and provides for the publication of the Declaration of interest on the EUDA website.

3. Personal data concerned

In this processing operation, EUDA processes data directly collected from you. Such data may include the following:

- First name and last name.
- *Membership to a specific EUDA entity or body.*
- Professional activities.
- Financial information.
- Professional activities and/or financial information related to the data subject spouse/partner and/or dependent family members.
- Information on any other relevant interests, which are, or could be perceived as, related to the EUDA's activities.

4. Responsible of the data

The EUDA is ultimately responsible for complying with Regulation (EU) 2018/1725. On behalf of the EUDA, the Executive Director is the 'data controller' to ensure the lawful conduct of this processing operation.

5. Who has access to your information and to whom is it disclosed?

As required by the aforementioned Policy, the Declaration of interest will be published on the EUDA website and for the purpose of the relevant data processing will be disclosed to the recipients identified in the latter, namely the Members of the EUDA Management Board and EUDA Executive Director, as well as, under the authority of the latter and as required by the relevant data processing, the Head of the EUDA 'Executive office', the Head of the EUDA 'Resources management and administrative services unit' and the staff members in charge of the assistance to the EUDA Management Board and of the management of the EUDA website.

Furthermore, and in line with the pertinent provisions of the relevant EU legislation, the Declaration of Interest may be disclosed to bodies and actors in charge of audit, control, inspection or review of the EUDA acts, such as the European Court of Auditors, the EC Internal Audit Service, OLAF, the European Ombudsman and the European Data Protection Supervisor.

6. How long does the EUDA keep your data?

The EUDA Executive Director, as the responsible data controller, will ensure that any Declaration of interest is duly filed and kept for a maximum retention period which will expire on the date of the decision providing discharge to the EUDA Director, following the termination of the mandate of the concerned person in the relevant EUDA body.

In case the Declaration of interest is not delivered or is not complete, the EUDA Executive Director, as the responsible data controller, will contact the data subject concerned for the purpose of the required delivery or completion of the Declaration.

7. Data security

The Agency has put appropriate technical and organisational measures in place (security policies and procedures) to protect personal data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. The Agency takes all necessary measures to ensure the maximum safety and security of personal data held both offline and online, in hardcopy and digital form.

8. Your data protection rights

As a data subject (i.e., an individual whose personal data is processed), you have a number of rights:

- **Right to be informed** – This privacy statement provides information on how the EUDA collects and uses your personal data.
- **Right to access** – You have the right to access your personal data. You have the right to request and obtain a copy of the personal data processed by the EUDA.
- **Right to rectification** – You have the right to obtain - without undue delay - the rectification or completion of your personal data if it is incorrect or incomplete.
- **Right to withdraw consent** – You have the right to withdraw consent in line with Article 7 of Regulation (EU) 2018/1725 where the Agency relies on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before consent is withdrawn. Please note that if you withdraw your consent, this might have consequences on your membership. The EUDA will advise you if this is the case at the time you withdraw your consent.
- **Right to erasure** – You have the right to require the EUDA to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing. In certain cases, your

data may be kept to the extent it is necessary, for example, to comply with a legal obligation of the Agency or if it is necessary for reasons of public interest in the area of public health.

- **Right to restrict processing** – In a few, codified cases, you have the right to obtain the restriction of the processing, meaning that your data will only be stored, but not actively processed for a limited period of time.
- **Right to object** – If the Agency processes your data for the performance of a task in the public interest (without your consent or another lawful basis), you have the right to object to this processing on grounds related to your particular situation.
- **Right to portability** - Where the processing is carried out based on your consent and in automated means you have the right to receive your personal data (which was provided to the EUDA by you) in a machine-readable format. You may also ask the EUDA to directly transfer such data to another controller.

9. Contact information

For the purpose of exercising the above-mentioned rights or should you have any questions regarding the processing of your personal data, or you think that the processing is unlawful or not in compliance with this privacy statement, please contact in writing the EUDA Executive Director, as the responsible data controller.

10. Recourse

The data subject may address the EUDA data protection officer (DPO@euda.europa.eu) for possible questions concerning the protection of his/her personal data.

Without prejudice to any judicial remedy, the data subject will have the right to lodge a complaint with the European Data Protection Supervisor (edps@europa.eu), if he/she considers that his/her rights to the protection of his/her personal data have been infringed.