

EDPS record of processing activity

Record of EDPS activities processing personal data, based on Article 31 of 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.

Nr	Item	Description
	Personal data processing within EDPS Case Management System	
1.	Last update of this record	20-11-2018
2.	Reference number	45
	<i>Part 1 - Article 31 Record (specific legal obligation to publish – see Article 31(5)) < row to be deleted when filled in></i>	
3.	Name and contact details of controller	<p>European Data Protection Supervisor (EDPS) Postal address: Rue Wiertz 60, B-1047 Brussels Office address: Rue Montoyer 30, B-1000 Brussels Telephone: +32 2 283 19 00 Email: edps@edps.europa.eu</p> <p>Responsible department or role: Records Management Sector, EDPS - edps.cms@edps.europa.eu</p> <p>Contact form for enquiries on processing of personal data to be preferably used: https://edps.europa.eu/node/759</p>
4.	Name and contact details of DPO	edps-dpo@edps.europa.eu
5.	Name and contact details	NA



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.	of joint controller (where applicable)	
6.	Name and contact details of processor (where applicable)	Fabasoft Austria GmbH, A-4020 Linz, Austria privacy@fabasoft.com ; dpo-at@fabasoft.com https://www.fabasoft.com/en/privacy-policy
7.	Very short description and purpose of the processing	<p>The CMS is used to ensure that documents and records produced and received in the context of EDPS activities are managed according to applicable legal basis and internal policies and procedures. The document and case management system at the EDPS answers a number of essential needs of the institution:</p> <ul style="list-style-type: none"> - ensure business continuity and accountability in the context of EDPS activities by keeping appropriate documentation on them, and contribute to the transparency of EDPS activities to the citizen - improve quality of services with case management, collaboration and workflow features - preserve the institutional memory of the EDPS, through long term preservation of certain categories of files for archiving purposes <p>a) The CMS is thus used in many EDPS business processes/procedures. In this respect, this record complements all records of those operations processing personal data that are supported by the CMS (see also section 8 on the description of categories of personal data processed). The CMS is not the only document management tool used by the EDPS (e.g. most Human Resources processes are supported by “Sysper”, finance processes by ABAC etc.).</p> <ul style="list-style-type: none"> • b) Then, to use the CMS as a document management system, we process personal data for these specific purposes: • - Set up the user account to enable users to access the system (for EDPS staff).



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.		<ul style="list-style-type: none"> • - Fill in relevant metadata fields at case and document level to comply with internal rules and procedures on case, records and document management.
8.	Description of categories of persons whose data the EDPS processes and list of data categories	<p>a) To use the CMS as a document management system, we process personal data of: of:</p> <ul style="list-style-type: none"> • EDPS staff (for the creation of user accounts, work attribution, business workflow activities) • Members and staff of EU institutions, bodies and agencies sending or receiving a document to or from the EDPS • Any individual sending or receiving a document to or from the EDPS <p>b) Additional personal data may be provided by data subjects themselves in the context of information exchanges, such as complaints, requests for information or advice, requests for own personal data, or by third parties (e.g. other institutions), or collected by the EDPS to carry out their institutional tasks. Such data are included in documents provided to EDPS, and not recorded separately in the system.</p> <p>The processing of personal data contained in the documents themselves is accounted for by the record of the business process/procedure they support. For example, processing of personal data contained in documents relating to complaints is accounted for by the record on “Complaints”. This record complements those records by taking into account the use of the CMS.</p> <p>In this case personal data may belong to any individual who has been in contact with the EDPS or even third parties.</p> <p>Personal data included in the system by the EDPS staff or automatically (e.g. for email addresses):</p> <ul style="list-style-type: none"> • Name • Surname • Address (email and/or physical and telephone number - if provided, for data subjects outside EDPS) • Organisational entity



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9.	Time limit for keeping the data	<p>The CMS has a module for the implementation of the retention periods established per each category of files in the EDPS Retention Schedule. The schedule, prepared in cooperation with all teams and the DPO, sets out the retention periods per case file type on the basis of the administrative, legal and financial usefulness. It also indicates the subsequent actions at the end of the administrative retention period on the basis of the potential historical value of documents and files (elimination, sampling or selection and long term preservation for archiving purposes).</p> <p>The retention period of the personal data used as metadata and/or contained in the documents is also defined in the records of the operational processes supported by those documents.</p> <p>The personal data of EDPS staff members are actively processed in the system for the duration of their employment relation with EDPS, for user accounts, allocation of cases and workflow related activities. Once a staff member leaves the EDPS, the user account is deactivated, so that the system cannot be accessed through it anymore; the name of the staff member remains in the system in connection with his/her cases (for accountability and corporate memory reasons), but cannot be further used for allocating new cases or activities.</p>
10.	Recipients of the data	<ul style="list-style-type: none"> • EDPS members and staff on a need to know basis • Fabasoft staff on a need to know basis in the frame of contractual arrangements for operational support <p>For data processed in the context of archiving in the public interest, when the archiving process is operational, future recipients would be:</p> <ul style="list-style-type: none"> • additional potential processors, in the case of an external IT solution catering for the long term preservation of the archives • Historical Archives of the European Union in Florence (European University Institute) • Potentially any individual having access to the archives once they are open to the public according to the thirty years rule established in relevant Regulations on Archives applicable to all EUIs
11.	Are there any transfers of personal data to third	NA



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.	countries or international organisations? If so, to which ones and with which safeguards?	
12.	General description of security measures, where possible.	<p>The production environment is accessible on the basis of a user account and a certificate created for each user. If only one of the two elements is present / active, the system cannot be accessed.</p> <p>Within the system, access control lists are in place. Users access different classes and files, and can perform different operations (read, edit both on metadata and documents) on the basis of their role and the group they belong to. Additional restrictions can be obtained by using “security levels” at class or specific case file level.</p> <p>The full text search functionality can show personal data of different type, as contained in the documents. Security is ensured there as well, as this functionality takes into account the access rights restrictions to documents and files, so search results only include files and documents for which each user has relevant access rights.</p> <p>Audit logs provide information on changes made to objects stored in the system and enable accountability on operations performed via the system.</p> <p>An SLA and Data Protection Safeguards were agreed between the EDPS and Fabasoft, and are part of the contractual arrangements. They give reasonable assurance of appropriate technical and organisational measures, including information security. The contractor has provided relevant information and third party certifications.</p>
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	DPN available internally

