



EDPS
EUROPEAN DATA PROTECTION SUPERVISOR

PROCESSING OF PERSONAL DATA IN THE EDPS PUBLIC-KEY INFRASTRUCTURE (PKI)

DATA PROTECTION NOTICE

The EDPS IT processes personal data to support the production of digital certificates attesting to the identity of the holder (the data subject).

Possession of the digital certificate counts as proof of identity for the purpose of authentication in the Case Management System (CMS) application, for sending and receiving S/MIME encrypted emails, and for signing documents in electronic form, in accordance with the EDPS Acceptable Use Policy for electronic signatures for these particular digital certificates.

In order for digital certificates to fulfil the aforementioned functions, the system must record information on the identity of the natural persons to whom certificates are issued.

The public-key infrastructure (PKI) is the system to support the issuing, renewal and revocation of certificates. It is maintained and managed by the EDPS, Technology and Privacy Unit, Digital Transformation Sector. It is hosted at the European Parliament (EP) in one of the isolated EP's private networks. The EP DG ITEC agreed to implement network filters so that the EDPS PKI is accessible only to the EDPS staff.

EDPS staff members receive a digital certificate if their role requires so.

All interactions with the PKI are logged in the access log for security purposes.

Personal data are processed based on [Regulation \(EU\) 2018/1725](#) ('the Regulation').

The following information is provided as established in Articles 15 and 16 of the Regulation.

Who is the controller?

The controller is the 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

Operational controller:
Technology and Privacy Unit
Digital Transformation Sector
EDPS IT
EDPS-IT@edps.europa.eu

Contact form for enquiries on processing of personal data to be preferably used:
https://www.edps.europa.eu/about-edps/contact_en.

For more information on the EDPS please consult our website: <https://edps.europa.eu>.

Who is the processor?

The European Parliament (EP) DG ITEC is a processor for this processing activity. It:

- Provides, manages, maintains the Linux VM (including the backup) that hosts the EDPS PKI
- Provides technical support to the EDPS T&P - Digital Transformation Sector

EP DPO contact: data-protection@ep.europa.eu

What personal data do we process and who has access to this personal data?

We process personal data of EDPS staff. The specific data are:

- Professional email address
- Username
- Organisational entity (EDPS and Fabasoft)
- Public-private key per for encryption and electronic signatures

The EDPS IT function will have access to the data in the context of creating certificate requests, re-issuing a certificate and revoking a certificate.

The EDPS shares public keys of their users via the SECABC IT platform with participating European institutions, Bodies and Agencies (EUIBAs) to facilitate end-to-end encryption of emails. Find more information in the SECABC data protection notice (https://www.edps.europa.eu/system/files/2024-06/24-05-12_edps_data_protection_notice_secabc_en.pdf).

The EP, in its role as service provider for the EDPS, could have, under certain conditions (i.e. strict need to know for example for IT support matters), access to personal data.

Where did we get your personal data?

Personal data is collected from the inter-institutional contact directories (the provider of our IT infrastructure is EP).

Why do we process your personal data and under what legal basis?

The overall purpose of the processing is to generate the digital certificates that the EDPS staff members need in order to authenticate in the CMS application, to use email encryption, and to sign documents in electronic form, in accordance with the EDPS Acceptable Use Policy for electronic signatures.

The **specific purpose** is to set up end entities and certificate requests, to enable users

to access the CMS application and to sign documents in electronic form.

We process your personal data under the following **legal basis**:

- Article 5(1)(a) of the Regulation: necessary for the performance of a task carried out in the public interest.

How long do we keep your personal data?

The personal data of EDPS staff members are actively processed in the PKI for the duration of their employment relation with EDPS, for digital certificate renewal or re-issuing.

Once a staff member leaves the EDPS, the digital certificate is revoked, so that it can no longer be used to access CMS; the email address of the staff member remains in the PKI, embedded in the expired and/or revoked digital certificates, but cannot be further used for other activities.

The overall time limit for which the expired and revoked certificates are kept in PKI is 30 years, which is the time frame in order to keep an exhaustive and secure Certificate Revocation List.

What are your rights regarding your personal data?

You have the right to request access to your personal data and to relevant information concerning how we use it. You have the right to request rectification of your personal data. You have the right to ask for the erasure of your personal data or to restrict its processing. You have the right to object to the processing of your personal data, on grounds relating to your particular situation, at any time.

Please note that, in certain cases, as provided in Article 25 of the Regulation, restrictions of data subjects' rights may apply.

We will consider your request, take a decision and communicate it to you. The time limit for treating your request is one (1) month. This period may be extended by two (2) further months where necessary, taking into account the complexity and the number of the requests. In those cases, the EDPS will inform you of the extension within one (1) month of receipt of your request and will provide reasons for the delay.

You can send your request to the EDPS electronically or by post (see section on contact details below).

Automated decision-making

Your personal data is not subject to automated decision-making.

You have the right to lodge a complaint

If you have any remarks or complaints regarding the way EDPS processes your personal data, we invite you to contact the operational controller or the EDPS DPO (see section on contact details on the first page and below).

You have, in any case, the right to lodge a complaint with the EDPS as a supervisory authority: https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en.

Contact details for enquiries regarding your personal data

We encourage you to contact us using the EDPS contact form, selecting 'My personal

data' as the relevant subject: https://www.edps.europa.eu/about-edps/contact_en.

If you wish to contact the EDPS DPO personally, you can send an e-mail to DPO@edps.europa.eu or a letter to the EDPS postal address marked for the attention of the EDPS DPO.

EDPS postal address: European Data Protection Supervisor, Rue Wiertz 60, B-1047 Brussels, Belgium

You can also find contact information on the EDPS website: https://edps.europa.eu/about-edps/contact_en.