



# Record of processing activity

---

## IT Service Management

### Record of EBA activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 (EUDPR)

Nr	Item	Description
<b>Part 1 - Article 31 Record</b>		
1	Last update of this record	01/12/2022
2	Reference number	EBA/DPR/2022/14
3	Name and contact details of controller	<p>Controller: European Banking Authority (EBA), Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France</p> <p>Responsible department: Operations, IT Unit</p> <p>Email address: <a href="mailto:eba-it-dp@eba.europa.eu">eba-it-dp@eba.europa.eu</a></p>
4	Contact details of DPO	<a href="mailto:dpo@eba.europa.eu">dpo@eba.europa.eu</a>
5	Name and contact details of joint controller (where applicable)	Not applicable
6	Name and contact details of processor (where applicable)	<ol style="list-style-type: none"> <li>1. UniSystems Systemes Informatiques Societe Anonyme Comercaire Unipersonnelle Rue des Deux Eglises 26, boite 4 B-1000, Bruxelles Belgium UniSystems provides IT Unit contractors</li> <li>2. Microsoft Ireland Operations Limited Microsoft EU Data Protection Officer One Microsoft Place South County Business Park Leopardstown Dublin 18 D18 P521 Ireland Telephone: +353 (1) 706-3117 <a href="https://aka.ms/privacyresponse">https://aka.ms/privacyresponse</a> Microsoft hosts the EBA directory, and relevant documents supporting IT service management</li> </ol>

Nr	Item	Description
7	Short description and purpose of the processing	<p>The EBA processes personal data within the processing activity of 'IT Service Management' to maintain and operate a modernised IT workspace and to deliver the following services to internal and external stakeholders:</p> <ul style="list-style-type: none"> <li>• IT project management to manage projects in all their phases;</li> <li>• IT contract and vendor relationship management to manage IT contracts, contractors and contact points with vendors;</li> <li>• IT operations management to keep the IT resources up and running;</li> <li>• IT service level management to make sure that IT services operate in the contractually agreed level (this service does not process personal data);</li> <li>• IT change management to manage changes in the IT services, resources, systems (this service does not process personal data);</li> <li>• IT architecture and modelling to conceptualize and implement architecture in IT services (this service does not process personal data);</li> <li>• IT test and validation to test and validate that IT services developed work as foreseen; to this purpose, Microsoft provisions guest accesses to external stakeholders;</li> <li>• IT training and newcomer induction to provide training to EBA newcomers in regard to IT (this service does not process personal data);</li> <li>• IT tender preparation and evaluation to handle the lifecycle of an IT tender;</li> <li>• IT reporting to create and provide reports in regard to IT services to senior and upper management (this service does not process personal data);</li> <li>• IT service catalogue management to manage the EBA IT service catalogue (this service does not process personal data).</li> </ul>
8	Description of categories of persons whose data the EBA processes and list of data categories	<p>The EBA processes personal data of the following categories of persons (except for IT operations management, IT service level agreements, IT architecture and modeling, IT training and newcomer induction, IT tender and evaluation, IT reporting, IT service catalogue management):</p> <ul style="list-style-type: none"> <li>• Internal to the EBA <ul style="list-style-type: none"> <li>• EBA statutory staff (temporary agents and contract agents);</li> <li>• EBA non-statutory staff (Seconded National Experts);</li> <li>• EBA trainees;</li> <li>• EBA contractors (current and candidates).</li> </ul> </li> <li>• External to the EBA <ul style="list-style-type: none"> <li>• Guest users only for test &amp; validation (stakeholders from National Competent Authorities (NCAs), private banks, invited by EBA staff);</li> <li>• Legal representatives of processors when included in contracts signed by processors and EBA.</li> </ul> </li> </ul>

Nr	Item	Description
		<p>The EBA processes the following categories of personal data:</p> <ul style="list-style-type: none"> <li>• For IT project management: name, surname, and email address of all involved parties;</li> <li>• For IT contract and vendor relationship management: name, surname, and email address of all involved parties, curricula vitae of the potential contractor employees;</li> <li>• For IT operations management: name, surname, and email address of IT EBA staff and contractors that perform IT operations;</li> <li>• For IT test and validation: name, surname, and email address of users engaged in testing;</li> <li>• For IT tender preparation and evaluation: name, surname, phone number and email address of company's representatives.</li> </ul>
9	Time limit for keeping the data	<p>Time limit for keeping the above-mentioned personal data processed within the below subset of services is as follows:</p> <ul style="list-style-type: none"> <li>• IT operations management: Personal data are kept for five (5) years for IT operation and auditing purposes. When data reach five (5) years' age, they are automatically purged from the systems;</li> <li>• IT project management: Six (6) months after the termination of a framework contract all personal data are deleted;</li> <li>• IT contract and vendor management: Curricula vitae of contractors, included unsuccessful candidates, are deleted as soon as the interview selection phase has been completed;</li> <li>• IT test and validation: List of users for testing applications (IT Unit staff members and contractors, NCA representatives), is kept as long as the purpose of IT testing and validation is valid which depends on the project duration it refers to;</li> <li>• IT tender preparation and evaluation: Name, surname and email of companies' legal representatives are kept; six (6) months after termination of a framework contract all personal data are deleted.</li> </ul>
10	Recipients of the data	<p>Recipients of personal data processed within the context of this processing activity are as follows:</p> <ul style="list-style-type: none"> <li>• Internal to the EBA <ul style="list-style-type: none"> <li>• duly authorised IT Unit staff members.</li> </ul> </li> <li>• External to the EBA <ul style="list-style-type: none"> <li>• duly authorised IT Unit contractors who sign a confidentiality declaration with the EBA and are subject to the <a href="#">EBA Standard on Access Control and Authentication</a>; service providers such as UniSystems and Microsoft are bound to confidentiality contractual clauses;</li> <li>• For IT test and validation: NCA responsible person might request the respective NCA users list who have access to EBA's systems for reviewing purposes;</li> </ul> </li> </ul>

Nr	Item	Description
		<ul style="list-style-type: none"> <li>For IT project management: NCA management board might receive project details that contain personal data.</li> </ul>
11	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<p>The EBA has entered a contract with Microsoft Ireland Operations Limited under the framework contract DI/076770 between DIGIT, European Commission, and Microsoft.</p> <p>Regarding data transfer, at rest data are stored encrypted on a data centre located in the European Union (EU); in transit data are transmitted encrypted and implemented with cryptographic keys.</p> <p>Data transfers may include the following countries: United States of America, United Kingdom, China (P.R.C.), Serbia, India, Israel, Canada, Switzerland, South Africa, United Arab Emirates, Australia, Chile, Brazil, Egypt, Japan, Republic of Korea, Singapore, and Malaysia. Personal data processed may be transferred outside of the EU through Microsoft’s sub processors, for a limited period of time and for service execution purposes, when outside of the EU. A list of Microsoft’s current sub processors is available at <a href="https://aka.ms/servicesapprovedsuppliers">https://aka.ms/servicesapprovedsuppliers</a>.</p> <p>Microsoft commits itself, in the proposed Custom Data Processing Agreement (DPA), to have in place written agreements with all sub processors that are at least as restrictive in terms of data protection and security as their data processing agreement with the EU Institutions, Bodies and Agencies (EUI).</p> <p>Due to the nature and the complexity of the service provided by a provider of public cloud services, it is highly unlikely that a set of personal information per individual product/service, processing activity and data category can be obtained for each sub processor used.</p>
12	General description of security measures, where possible	<p>Processing of personal data in the context of this processing activity is carried out pursuant to the <a href="#">EBA Decision (EBA/DC/138)</a> of 29 October 2015 on the security of communication and information systems in the EBA. The EBA adopted <a href="#">Commission Decision (EU, Euratom) 2017/46</a> of 10 January 2017 on the security of communication and information systems in the European Commission.</p> <p>Processing is performed under the <a href="#">EBA Information Security Framework</a>, published on the EBA intranet. Those security controls include access control and authentication policy and technical controls; backup; audit trails; physical security policy and technical controls; patch management policy; data processing agreements (DPAs) with Microsoft.</p> <p>The EBA also requests vendors the ISO 27001 certification, meaning the EBA makes sure that they all have in place information security policies, procedures and guidelines.</p>

Nr	Item	Description
13	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	<a href="#">Data Protection Notice on IT Service Management</a>