



# Record of processing activity

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## WORKSPACE OPTIMIZATION PLATFORM – ‘CONDECO APP’

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 (publicly available)</b>		
1	Last update of this record	15/09/2021
2	Reference number	EBA/DPR/14
3	Name and contact details of controller	Controller: European Banking Authority, Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France  Contact: Local functional mailbox
4	Name and 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)	Condeco Software Sarl 13 Rue du Docteur Lancereaux Paris, 75008, France
7	Short description and purpose of the processing	<p>The Condeco App enables simple control of every part of the EBA’s workplace management plan on a single platform. Workplace management considers the productivity and efficiency of the office space. The app helps EBA to maximize office space and adapt to changing employee needs with flexible, cloud-based technology. More in particular, the tool allows the following actions:</p> <ul style="list-style-type: none"><li>• Control use of space: manage occupancy of office space;</li></ul>

Nr	Item	Description
		<ul style="list-style-type: none"> <li>• Manage rules on space booking: develop workspaces that fulfil the needs of EBA’s staff members;</li> <li>• Accommodate remote working;</li> <li>• Combine all workspace needs: schedule the whole day at the office from one single platform;</li> <li>• Connect the workplace experience: enable blending of office and remote working for EBA’s staff member.</li> </ul> <p>Specifically, the Condeco App is used for effective workspace management i.e., productivity, efficiency and optimization of the office space. The tool will assist the EBA staff in returning to the office safely and managing the so-called ‘new normal’ which requires flexible working once the threat of COVID-19 pandemic subsides.</p> <p>The tool will assist in implementing health and safety protocols by actively managing workstation availability, sanitization and social distancing. Notably, the Corporate Support team will have an overview of desks that are in use for the day, including meeting rooms and this will assist them in sanitising the desks and meeting rooms once staff have checked out of their desks or concluded a meeting. Also, the app will assist in configuring fixed seating arrangements to ensure that social distance is maintained from one workstation to the other.</p> <p>EBA staff will use the tool to book car parking spaces, workstations, meeting and quiet rooms. The purpose of processing is to enable Condeco to provide and the EBA to receive the services.</p> <p>The EBA may enable QR codes functionality to bookable desks and staff will be required to check in to their bookings by scanning the code displayed at the desk, using the Condeco mobile app and the mobile device camera. With QR code scanning enabled, EBA administrators can verify which booked spaces are actually in use and which are not, and any workspace that was booked but the QR code not scanned, can be made available for others to book.</p> <p>The application will also allow to provide the management with workplace usage reports that will help develop future forecasts, determine productivity and efficiency of the office space and improve decision-making.</p>
8	Description of categories of persons whose data the EDPS processes and list of data categories	<p>The category of Data Subject is EBA staff members who are users of the services and occupants of the EBA office space.</p> <p>The Personal Data to be processed include the following:</p> <ul style="list-style-type: none"> <li>• EBA staff names – First Name and Surname</li> <li>• EBA staff email addresses, login and password credentials</li> </ul>

Nr	Item	Description
		<ul style="list-style-type: none"> <li>• Names of Seconded National Experts actively working in the EBA – First Name and Surname</li> <li>• Seconded National Experts’ email addresses, login and password credentials</li> <li>• Names of Trainees actively working in the EBA – First Name and Surname</li> <li>• Trainees’ email addresses, login and password credentials</li> <li>• Names of External Consultants actively working in the EBA – First Name and Surname</li> <li>• External Consultants’ email addresses, login and password credentials</li> <li>• Information about room bookings and workstation usage (namely who is using which desk and in which timing – morning/afternoon/all day and Including days of the week).</li> </ul>
9	Time limit for keeping the data	<p>Personal data (First name, Surname, email addresses, login and password) of EBA staff in active employment is kept for the purposes of using the Condeco services for as long as EBA continues to use the Condeco App.</p> <p>Condeco shall delete and procure the deletion of all copies of those Personal Data promptly and in any event within 90 days of the date of cessation of any Services involving the Processing of EBA staff Personal Data (the "Cessation Date"). The 90 days allows Condeco to finalise their internal processes.</p> <p>EBA staff who leave the EBA are immediately deleted from the active directory after termination of employment.</p> <p>Personal data related to the usage of desks, parking space, meeting and quiet rooms will be retained for 12 months to facilitate reporting purposes.</p>
10	Recipients of the data	<p>Designated EBA staff members from Corporate Support who will be the administrators in the management of the tool. All EBA staff will be able to only view staff names assigned to workstations/meeting rooms.</p> <p>Condeco customer service support - 24/7 technical support via online ticket portal in case of any issues.</p>
11	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<p>As part of Condeco’s Customer Support programme, Customer Support and Cloud Operations staff based in India may have limited access to Data under controlled circumstances. In case of any malfunctioning or glitches with the app, only the EBA administrators will raise a ticket in Condeco’s ticket system. The customer support has access to the data stored in the ticket system (content of the ticket, name, e-mail, telephone number) in order to process a ticket. To govern this access, there are a number of key</p>

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		<p>controls in place to maintain the security and Integrity of EBA Data, namely:</p> <ul style="list-style-type: none"><li>• There are Standard Contractual Clauses (SCC) in place between Condeco and Condeco Software Private Ltd to govern any potential data transfer</li><li>• Access to EBA Data is severely restricted, and Customer Support and Cloud Operations personnel do not have permanent or automatic access to EBA Data</li><li>• MFA Authentication is mandatory for all access</li><li>• Access to the limited EBA ticket Data will only take place in the pursuit of customer support activities in relation to customer reported issues or requests</li><li>• Access to EBA Data is granted following a “Just in Time” principle, with access provide to appropriately authorised and qualified personnel</li><li>• Access to EBA Data is revoked immediately the need no longer arises</li><li>• At all times, EBA Data remains stored and processed in our geo-located production instance in Netherlands and is never transferred to India, except the secured information included in the ticket raised only by the administrators.</li></ul>
12	General description of security measures, where possible	<p>Condeco takes reasonable technical and organisational precautions to prevent the loss, misuse or alteration of EBA personal information.</p> <p>Condeco is certified according to ISO 27001:2013 and CSA STAR standards: they will store all the personal information EBA provides on their certified IT infrastructure. Condeco’s Information Security Management System (ISMS) has over 100 controls and is certified in accordance with the ISO standard, and their SaaS services are CSA STAR certified, complementing the security within the Azure platform.</p> <p>Moreover, data at rest in their systems and in transit over the Internet are always encrypted.</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:	EBA Privacy Notice available <a href="#">here</a>