



Record of processing activity

Board of Supervisors/Management Board Signal group – Contact details management

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

Nr	Item	Description
Part 1 - Article 31 Record (publicly available)		
1	Last update of this record	28/10/2021
2	Reference number	EBA/DPR/2021/16
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: EBA-BoS-Support@eba.europa.eu; mb-support@eba.europa.eu
4	Name and contact details of DPO	dpo@eba.europa.eu
5	Name and contact details of joint controller (where applicable)	N/A
6	Name and contact details of processor (where applicable)	Signal is a 3 rd party messaging smartphone application which can also make calls, with end-to-end encryption of information. Signal Privacy Notice: https://support.signal.org/hc/en-us/articles/360007059412-Signal-and-the-General-Data-Protection-Regulation-GDPR- Contact: https://support.signal.org/hc/en-us/requests/new
7	Short description and purpose of the processing	The EBA will ask BoS and MB members to provide their business mobile phone numbers. The EBA IT team will create a BoS and MB list for the Signal app and the BoS and MB members will be asked to download and install Signal app on their business mobile phones. Finally, the EBA will create a group chat on Signal and invite relevant BoS and MB members. The purpose of this process is facilitating emergency contact between EBA and BoS/MB members and their alternates when normal channels of communication are unavailable, for example when email services are unavailable. It

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		would not be used for distributing restricted or confidential information.
8	Description of categories of persons whose data the EBA processes and list of data categories	Voting members of the Board of Supervisors and their alternates, Management Board members Categories of data: Full Name, Business Mobile phone number
9	Time limit for keeping the data	The list of contacts will be retained by the EBA up to one year and reviewed for retention every year in September. The obsolete data will be deleted at this occasion. The data subjects can permanently disable their phone number from being recognized as a Signal user by unregistering their phone number directly in the application.
10	Recipients of the data	EBA staff member with responsibility for BoS/MB administration and relevant members of EBA IT unit.
11	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	The access to the list of contacts by EBA staff will be limited to what is strictly necessary for this processing. Signal app is based in the USA. However, the European Commission's Information Technology and Cybersecurity Board has been promoting and recommending Signal as the safest alternative in terms of security and privacy and therefore, the EBA considered it as the most suitable tool Signal uses end-to-end encryption. It aims to protect users' communications not only from malicious hackers, spying governments or service providers (like internet service providers or chat service providers). What end-to-end means is that the communication is encrypted from the sender all the way to the receiver and nobody in between has access to it. Not even the service that owns the application can read what users send.
12	General description of security measures, where possible	Contact details are stored in EBA access-controlled systems with restricted access. Signal is protecting the personal data using state-of-the-art security and end-to-end encryption. Signal messages, pictures, files, and other contents are stored locally on data subjects' devices. These contents are readable by the open-source Signal clients. Because everything in Signal is end-to-end encrypted, the Signal service does not have access to any of this data.