



Record of processing activity

IT Workplace Services

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		
1	Last update of this record	01/12/2021
2	Reference number	EBA/DPR/2022/15
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: eba-it-dp@eba.europa.eu</p>
4	Contact details of DPO	dpo@eba.europa.eu
5	Name and contact details of joint controller (where applicable)	Not applicable
6	Name and contact details of processor (where applicable)	<p>1. CANCOM online BVBA Rue Montoyer 35 Brussels Belgium</p> <p>CANCOM provides the software for printing services</p> <p>2. UniSystems Systemes Informatiques Societe Anonyme Commerciale Unipersonnelle Rue des Deux Eglises 26, boite 4 B-1000, Bruxelles Belgium</p> <p>UniSystems provides staff for IT service desk and incident management as well as software/hardware provision</p> <p>3. Microsoft Ireland Operations Limited Microsoft EU Data Protection Officer One Microsoft Place South County Business Park Leopardstown</p>

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		<p>Dublin 18 D18 P521 Ireland Telephone: +353 (1) 706-3117 https://aka.ms/privacyresponse</p> <p>Microsoft Ireland Operations Limited provides software (Windows)</p> <p>4. Bechtle Brussels NV/SA Peerderbaaan 207 3910 Neerpelt Belgium</p> <p>Bechtle provides the Jira software for IT service desk and incident management</p>
7	Short description and purpose of the processing	<p>The EBA processes personal data within the processing activity of 'IT Workplace Services' to provide a modernised IT workspace that enables users to operate seamlessly. The EBA delivers the following services to users:</p> <ul style="list-style-type: none"> • IT service desk and incident management to fulfil requests from EBA staff, trainees, contractors and external collaborators (e.g., National Competent Authorities) on services provided by the EBA IT Unit; • Hardware and software provision to provide EBA staff, trainees and contractors with hardware (e.g., laptops) and install, maintain and update software on systems (e.g., laptops, servers); • Printing to provide the organisation with printing services.
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:</p> <ul style="list-style-type: none"> • Internal to the EBA <ul style="list-style-type: none"> • EBA statutory staff (temporary agents and contract agents); • EBA non-statutory staff (Seconded National Experts) • EBA trainees; • EBA contractors. • External to the EBA <ul style="list-style-type: none"> • Guest users (stakeholders, including NCA representatives, invited to the EBA systems by staff members). <p>The EBA processes the following categories of personal data:</p> <ul style="list-style-type: none"> • For IT service desk and incident management: name, surname, email address, username, IP address; • For hardware and software provision: name, surname, username; • For Printing: name, surname, username, IP address.
9	Time limit for keeping the data	<ul style="list-style-type: none"> • With regards to IT service desk and incident management time limit for keeping the above-mentioned categories of personal data corresponds to ten (10) years for knowledge management purposes (e.g., keeping a knowledge base of resolved issues helps IT staff to learn from previous

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		<p>incidents and quickly resolve new ones and/or identify root causes of incidents) and service level quality measurement (e.g., evaluate the contractor about the quality of the service provided).</p> <ul style="list-style-type: none"> • With regards to hardware and software provision, time limit for keeping the above-mentioned categories of personal data corresponds to the duration of the concerned data subject's working relationship with the EBA. At the end of the working relationship and following the exit procedure for leavers, personal data of the data subject are deleted from the system. Afterwards, personal data are permanently deleted in the processor's system after 30 days. • With regards to the printing service, personal data are kept for thirty (30) days, then it is automatically overwritten by the system.
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"> • Internal to the EBA <ul style="list-style-type: none"> • duly authorised IT Unit staff members. • External to the EBA <ul style="list-style-type: none"> • duly authorised IT Unit contractors who sign a confidentiality declaration with the EBA and are subject to the EBA Standard on Access Control and Authentication; service providers such as CANCOM, UniSystems, Microsoft and Bechtle are bound to confidentiality contractual clauses.
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 European Union (EU) data centre; 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 https://aka.ms/servicesapprovedsuppliers.</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.</p>

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12	General description of security measures, where possible	<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 EBA Decision (EBA/DC/138) of 29 October 2015 on the security of communication and information systems in the EBA. The EBA adopted Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.</p> <p>Processing is performed under the EBA Information Security Framework, 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 Cancom, UniSystems, Microsoft and Bechtle.</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>
13	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	<p>Data Protection Notice on IT Workplace Services</p>