

Record of processing activity

EBA Electronic Document and Records Management System (ERMS)

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

Part 1 - Article 31 Record (publicly available)

1	Last update of this record	16/02/2026
2	Date of next review	16/02/2028
3	Reference number	EBA/DPR/2025/2
4	Name and contact details of controller	<p>Controller: European Banking Authority, Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France</p> <p>Responsible Department: Governance and External Affairs</p> <p>Contact: info@eba.europa.eu</p>
5	Contact details of DPO	dpo@eba.europa.eu , or alternatively send a letter to the postal address of the EBA (address above) marked for the attention of the DPO of the EBA.
6	Name and contact details of joint controller (where applicable)	<i>Not applicable</i>
7	Name and contact details of processor (where applicable)	<p>1. Microsoft Ireland Operations Limited, Microsoft EU Data Protection Officer, 1 One Microsoft Place, South County Business Park, Leopardstown, Dublin 18 D18 P521, Ireland. Telephone: +353 (1) 706-3117 https://aka.ms/privacyresponse Microsoft provides SharePoint Online and related applications that support ERMS as part of broader activities (such as Azure cloud for back up).</p> <p>2. European Dynamics, 18, Fragoklissias & 53, Samou Str. 15125 Maroussi Athens, Greece G.E.MH. nr.: 002024901000 Tel.: +30 210 8094500</p>

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e-mail: info@eurodyn.com
<https://www.eurodyn.com/privacy> European Dynamics
 provides technical support in relation to ERMS.
 3. Atos Belgium NV
 Da Vincilaan 5
 B-1930 Zaventem
<https://atos.net/en/contact-us>
<https://atos.net/en/privacy>
 ATOS provides backup services.

8 **Short description and purpose of the processing activity**

The EBA Electronic Document and Records Management System (ERMS) is designed to support EBA staff in the creation, receipt, maintenance, use, and disposition of EBA records created by the full range of business activities happening at the EBA. This processing operation is a corporate centralised processing operation.
 This will include the capture and management of some records that will contain personal data. The system will utilise access controls to ensure that any records containing sensitive personal data are seen on a need-to-know basis, by only the staff who are involved in the activity related to the processing of those data.
 Additionally, ERMS will implement EBA's record retention policies to help ensure that personal data are not retained longer than is necessary, as specified in EBA's retention policy and its Records of Processing Activities.
 Some of EBA's records will be archived permanently in accordance with Council Regulation concerning the opening to the public of the historical archives - Regulation (EEC, Euratom) No 354/1983 and amendments (354/1983; 2015/496).
 The purpose of the system is to ensure EBA records are authoritative, and their integrity is preserved. Therefore, audit trail data capturing data about the author or participant involved in major records management actions can be processed to monitor and investigate actions taking place within ERMS, where needed. ERMS will ensure the institutional memory is preserved in accordance with regulatory obligations, and information is retained for the appropriate retention periods. This contributes to business continuity and transparency of EBA activities.

9 **Description of categories of persons whose data the EBA processes and list of data categories**

Description of categories of persons whose data the EBA processes

Internal to the EBA:

- EBA Staff, SNEs, Trainees, Contractors

External to the EBA:

- External participants in EBA activities that involve the processing of personal data where this personal data is captured in records captured in ERMS.

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Description of the categories of data that will be processed for internal staff members:

Metadata:

- metadata in relation to the creator of a given record: typically name and surname of the respective individuals;

Audit trail data:

- name, surname, account information of any author or participant involved in major records management actions

Access management and control data:

- name, surname, organisational unit, and individual access rights of a user may be processed.

For internal or external data subjects:

Content of records:

- The records processed may contain any category of personal data. However, this will not introduce additional purposes to the original processing operations. The adoption of the ERMS is simply a new method of processing personal data that has already been collected and processed for specific, legally justified purposes.

10 Special categories of personal data processed (as defined in Article 10 EUDPR)	<ul style="list-style-type: none"> ▪ No special categories of personal data are specifically required for running of the ERMS. Nevertheless, records captured in ERMS may incidentally include special categories of personal data in files relating to human resources or logistics.
11 Time limit for keeping the data	<p>Personal data captured in document contents and metadata: Retained along with the document in accordance with the EBA retention schedule. For some record series this period is indefinite.</p> <p>Audit trail data in M365: Retained for 3 years.</p> <p>Access control data: For as long as staff members are employed at EBA.</p>
12 Recipients of the data	<p>EBA staff members will have access to those records containing personal data on a need-to-know-basis.</p> <p>Internal EBA IT administrators may access to the ERMS system when necessary, in order to fulfil any tasks related to technical support for the system. Authorised External IT support (European Dynamics) and Providers of Back-up services (ATOS), who sign a</p>

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		<p>confidentiality declaration with the EBA and are subject to the EBA Standard on Access Control and Authentication, may also access ERMS, inclusive of metadata, audit trail, etc. in order to provide technical support. Service providers such as Microsoft are bound to confidentiality contractual clauses.</p>
13	<p>Are there any transfers of personal data to third countries or international organisations?</p>	<p>The EBA has entered a contract with Microsoft Ireland Operations Limited under the framework contract DI/076770 between DIGIT, European Commission, and Microsoft. The personal data stored on Microsoft platforms (including ERMS) remains within the EU data boundary: https://learn.microsoft.com/en-us/privacy/eudb/eu-data-boundary-learn?culture=en-us&country=us</p> <p>The EBA has adopted additional security measures to mitigate the risks of international data transfers still taking place despite the EU data boundary.</p> <p>ERMS is supported by IT consultants within the EEA: European Dynamics</p>
14	<p>General description of security measures, where possible</p>	<p>ERMS is an internal EBA system accessible only by EBA staff members and specified IT support colleagues.</p> <p>Access controls are in place to ensure personal data is accessed on a need-to-know-basis in relation to relevant staff members performing specific processing activities in the interest of the service or the data subjects.</p> <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. 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 Microsoft.</p>
15	<p>For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:</p>	<p>The data protection notice is available on the intranet</p>