



# Record of processing activity

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## Infrastructure Services

### 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/2022/13
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)	<p>1. 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></p> <p>Microsoft provides identity and access management</p> <p>2. CANCOM online BVBA            Rue Montoyer 35            Brussels            Belgium</p> <p>CANCOM provides database, server/virtual machine, application, storage administration and infrastructure security.</p>

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		<p>3. UniSystems Systemes Informatiques Societe Anonyme Comerciale Unipersonnelle Rue des Deux Eglises 26, boite 4 B-1000, Bruxelles Belgium</p> <p>UniSystems provides EBA IT Unit contractors</p>
7	Short description and purpose of the processing	<p>The EBA processes personal data within the processing activity of 'Infrastructure Services' to ensure proper infrastructure environment and to provide the following services:</p> <ul style="list-style-type: none"> <li>• identity and access management to create data subjects' electronic identity (username) and to manage the required access to systems and services;</li> <li>• database administration to keep normal database operations and to keep databases up to date;</li> <li>• server/virtual machine administration to keep normal server/virtual machines operations and to keep server/virtual machines up to date;</li> <li>• application administration to keep normal applications operations and to keep applications up to date;</li> <li>• storage administration, backup and restore services to keep normal backup and restore operations, to keep backup and restore up to date; and</li> <li>• infrastructure security to keep infrastructure security controls up and running.</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:</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.</li> </ul> </li> <li>• External to the EBA <ul style="list-style-type: none"> <li>• External stakeholders (National Competent Authorities (NCA) representatives), to be granted access to respective databases/systems upon request.</li> </ul> </li> </ul> <p>The EBA processes the following categories of personal data:</p> <ul style="list-style-type: none"> <li>• identity and access management: name, surname, position, email address, fixed line number, mobile phone number;</li> <li>• database administration: name, surname, position, email address;</li> <li>• server/virtual machine administration: name, surname, position, email address;</li> <li>• application administration: name, surname, position, email address;</li> <li>• storage administration: name, surname, position, email address;</li> <li>• backup and restore services: name, surname, position, email address;</li> </ul>

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		<ul style="list-style-type: none"> <li>• infrastructure security: name, surname, position, IP address, workstation device name.</li> </ul>
9	Time limit for keeping the data	Time limit for keeping personal data for all of the above-mentioned subset services corresponds to the duration of the contract of employment that the data subjects sign with the EBA or to the duration of the appointment for NCA representatives. At the end of the working relationship, and following the exit procedure for leavers, or of the appointment from the NCA, personal data of the data subject are deleted from the systems. Afterwards, personal data are permanently purged from the identity and access management provider within 30 days.
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 CANCOM, Microsoft and UniSystems are bound to confidentiality contractual clauses.</li> </ul> </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 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>

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12	General description of security measures, where possible	Processing of personal data in the context of this processing activity is carried out pursuant to <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. 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 Cancom, Microsoft and UniSystems.
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 Infrastructure Services</a>