



Record of processing activity

Telecommunication 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	01/12/2022
2	Reference number	EBA/DPR/2021/21
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 fixed line telephony and Cisco WebEx services</p> <p>2. Bouygues Telecom Service Informatique et Libertés 13-15 avenue du Maréchal Juin 92360 Meudon la Forêt France email to dpo@bouyguestelecom.fr https://www.corporate.bouyguestelecom.fr/mentions-legales/politique-dutilisation-des-donnees-personnelles/</p> <p>Bouygues provides corporate mobile telephone services</p> <p>3. Microsoft Ireland Operations Limited Microsoft EU Data Protection Officer One Microsoft Place</p>

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		<p>South County Business Park Leopardstown Dublin 18 D18 P521 Ireland Telephone: +353 (1) 706-3117</p> <p>https://aka.ms/privacyresponse</p> <p>Microsoft provides mobile device management and audio – video conferencing (MS Teams)</p> <p>4. 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 ‘Telecommunication Services’ to provide EBA staff, trainees and contractors with the following services:</p> <ul style="list-style-type: none"> • fixed line telephony (and voicemail system); • corporate mobile telephone (except trainees); • mobile device management meaning a software that allows IT administrators to control, secure and enforce policies on smartphones, tablets and other endpoints; • audio – video conferencing services by Cisco Webex and Microsoft Teams (see Record of Processing Activity ‘Audio – Video Communication and Collaboration Services’ available on the EBA website).
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"> • EBA statutory staff (temporary agents and contract agents); • EBA non-statutory staff (Seconded National Experts); • EBA contractors; • EBA Trainees (except for corporate mobile telephone). <p>The EBA processes the following categories of personal data:</p> <ul style="list-style-type: none"> • For fixed line telephone (IP phones): first and last name, IP address; • For voicemail system: telephone number of calling person, voice/message of calling person; • For corporate mobile telephone: first and last name, call detail record (CDR); • For mobile device management: first name, last name, username, email address, IP address; • Audio – video conferencing services: see Record of Processing Activity ‘Audio – Video Communication and Collaboration Services’ available on the EBA website.

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9	Time limit for keeping the data	<p>Time limit for keeping personal data for fixed line telephony (and voicemail system) and for mobile device management corresponds to the duration of the contract of employment that data subjects enter with the EBA. At the end of the contract of employment, personal data of the concerned data subject are deleted within 30 days¹ from the EBA directory, (Microsoft Azure AD) which is the primary source of information for telecommunication services.</p> <p>Time limit for keeping personal data for mobile telephony is one (1) year (for billing purposes), starting from the time they were generated. However, the service provider (Bouygues) is bound by legal obligations to hold CDR data for longer periods, namely for periods of not less than six months and not more than two years from the date of the communication in compliance with Directive 2006/24/EC of the European Parliament and of the Council of 15 March 2006 on the retention of data generated or processed in connection with the provision of publicly available electronic communications services or of public communications networks and amending Directive 2002/58/EC.</p> <p>Time limit for keeping personal data for mobile device management is, according to the EBA Information Security Framework, 30 days beginning from the date when the user is deleted from the system.</p> <p>Time limit for keeping personal data for audio and video conferencing services corresponds to the duration of the contract of employment that data subjects enter with the EBA. Microsoft deletes personal data within 30 days from the day when the EBA IT Unit deletes the leaver from the organisation’s directory. With regards to Cisco WebEx, time limit for keeping identification data corresponds to the duration of an active contract with Cisco. When the contract terminates, Cisco retains name and unique user identification for seven (7) years as part of Cisco’s business records which are maintained to comply with Cisco’s financial and audit requirements. IP addresses are kept for three (3) years as part of Cisco’s record of Service delivery.</p>
10	Recipients of the data	<p>Recipients of personal data processed within 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 with access to information to resolve requests in the service line of Telecommunication Services; IT Unit contractors sign a confidentiality declaration with the EBA and are subject to the EBA Standard on Access Control and Authentication; service providers CANCOM, Bouygues, Microsoft and UniSystems are bound to confidentiality contractual clauses;

¹ [Restore or permanently remove recently deleted user - Azure AD - Microsoft Entra | Microsoft Learn](#)

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11	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<ul style="list-style-type: none"> • external stakeholders receiving incoming calls (fixed or mobile telephony). <p>For international transfers within the audio and video conferencing services, please see Record of Processing Activity ‘Audio – Video Communication and Collaboration Services’ available on the EBA website.</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 the 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, Bouygues and Microsoft.</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:	Data Protection Notice on Telecommunication Services