NOTIFICATION

FOR DATA PROCESSING OPERATIONS

Date of registration: 28.6.2011

Register No: IT2

1. Name of the data processing operation

CIRCA LDAP Directory

2. Data Controller

Programme or Group:	OSE2 /Helpdesk
Function:	Head of OSE Programme
Contact person:	Sigfús Bjarnason; Helpdesk helpdesk@eea.europa.eu

3. Description of the processing operation

3.1. Area of activity in which the processing is carried out

CIRCA is an extranet tool which enables a given community (e.g. committee, working group, project group, etc...) geographically spread across Europe (and beyond) to maintain a private space on the Internet where they can share information, documents, participate in discussion for a, etc... It provides a private workspace called "interest groups" to collaborate on common objectives and tasks. Username, passwords, access control and other related information is processed in the EIONET LDAP Directory.

Personal data are collected and further processed for the purpose of the management of access rights and delivery of the services.

There is no restriction under Article 20 of Regulation (EC) No 45/2001; the processing operation does not require prior checking in accordance with Article 27 of Regulation (EC) No 45/2001.

3.2. Modalities for the processing operation

☒ Manual processing	Personal data is entered manually by the data user in a sign up form. This form allows user to obtain a CIRCA account in order to sign up and apply for an interest group membership. One username is sufficient for the whole CIRCA system.
☒ Automated processing	The system contains directory information about users of the EEA internal IT systems

3.3. Are the Personal data processed by an entity external to EEA ('processor')	
☒	Yes, the directory is managed by the EIONET helpdesk
☐	No

4. Lawfulness and purpose of the processing

4.1. Legal basis

The processing operation of the EEA CIRCA LDAP Directory is necessary for the performance and the support of the numerous tasks carried out by the EEA as mandated by Regulation (EC) No 401/2009, and in particular Article 2 thereof; implementing Regulation (EC) No 401/2009 calls for a modern and efficient communication infrastructure including collaboration tool.

As almost all institutional tasks have multiple communication aspects, which, considering the current state of the art in use in almost every organisation in a global networked environment in Europe and the world, require that these tasks be supported by the appropriate functionalities of a modern and well-functioning collaboration tool.

Furthermore, the European Code of good administrative behaviour, applicable to EEA pursuant to a Decision of its Management Board adopted on 22.6.2004, calls on the institutions, bodies and agencies of the European Union to have the support of an open, efficient and independent administration in carrying out their missions.

4.2. Grounds for lawfulness

The data processing is considered lawful because either:

o it is necessary for the performance of a task carried out in the public interest on the basis of Regulation (EC) No 401/2009 or in the legitimate exercise of official authority vested in the EEA (Article 5(a) of Regulation (EC) No 45/2001); and
o it is necessary to ensure compliance with a legal obligation stated in Regulation (EC) No 401/2009 to which to data controller is subject (Article 5(b) of Regulation (EC) No 45/2001; and
o the data subject has unambiguously given his or her consent (Article 5(d) of Regulation (EC) No 45/2001).

4.3. Purpose of the processing

To share information and documents, participate in discussions, cooperate on common objectives and tasks and keep the network of members operational.

5. Features of the processing operation

5.1. Categories of data subjects concerned

All EEA staff members, contracted consultants and EIONET partners

5.2. Categories of data

5.2.1. Data processed in the context of internal telecommunications networks

☒	Directories

5.2.2. Other categories of data

☒	Individual users are defined with meta data and access rights to interest groups and related documents for EEA EIONET network and related sites.
	Personal data of users includes in particular their name (first name and surname), their e-mail and postal address, telephone number and password. Optionally, users may provide their contact information (name of their organisation, title and description of their function, fax number).
	The system allows users to choose that their details be made publicly available or available to registered users only (the latter is the default setting).

6. Retention practice of personal data

Users may at any time cancel their registration or request to unsubscribe from an interest group; they would then be invalidated in the system. Users account data is kept for historical purposes.

7. Personal data processed for historical, statistical or scientific purposes

Purpose	Categories of data	Storage media
☒ Historical	User account data	☐ Anonymous ☒ Encrypted
☐ Statistical	n/a	☐ Anonymous ☐ Encrypted
☐ Scientific	n/a	☐ Anonymous ☐ Encrypted

8. Recipients or categories of recipients to whom the data might be disclosed

All EEA staff members, members of the EIONET and relevant consultants may access the data of the interest groups of their choice.

The authorization is granted through a username and a password which are requested by the system when users click on a specific interest group. In order to become a member (i.e. obtain a username and a password) users should read the information supplied for each interest group and then follow the subscription instructions.

9. Proposed transfer of personal data to third countries or international organisations

☐ Yes	☒ No transfer of personal data to third countries or international organisation

10. Information given to the data subjects as described in Articles 11 & 12 of the Regulation (EC) No 45/2001)

See the privacy statement attached as annex 1 to this notification

11. Procedures to enable data subjects to exercise their rights (as indicated in Articles 13 to 19 of the Regulation (EC) No 45/2001, i.e. access, rectification, blocking, erasure, objection)

CIRCA provides users with the option to directly access and edit their profile and configure their preferences applicable within the CIRCA environment. Users' personal data is simply their account information in the Directory Server. Users' Preferences is a set of options, which define the way the various types of information available within users' Interest Group will be displayed, viewed and sorted.

The 'Frequently Asked Questions' link on users interface provides access to a support team who deals with users enquiries; comments may also be sent to the interest group leader.

12. Time limits for blocking and erasure of the different categories of personal data (on justified legitimate request from the data subject – Please, specify the time limits for every category)

Categories of data	Blocking	Erasure
Any data asked for	Usually immediately and at maximum within 5 working days	Usually immediately and at maximum within 5 working days