



## NOTIFICATION FORM

### FOR DATA PROCESSING OPERATIONS

- To be filled out by the Data Protection Officer -

Date of registration: 10.5.2017

Register No: IT12

#### INFORMATION TO BE GIVEN<sup>1</sup>

##### 1. Name of the data processing operation

E-mail services – Microsoft Office 365

##### 2. Data Controller

Programme or Group:	IDM1/Helpdesk
Function:	Head of Group
Administrative address:	IDM1 - KN6 / Room 1.2.2
Postal address:	Kongens Nytorv 6, 1050 Copenhagen K
Contact person:	Örjan Lindberg

##### 3. Reason for notification (Please tick whichever is applicable)

<input type="checkbox"/>	Notification of a data processing operation prior to its implementation
<input type="checkbox"/>	Modification to a data processing operation
<input checked="" type="checkbox"/>	Regularization of a data processing operation already carried out

<sup>1</sup> Please attach all necessary backup documents.

4. Description of the processing operation (Please describe in your answer if you process personal data falling under Article 27 of the Regulation (EC) No 45/2001 (Prior check by the EDPS))

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

The Email service (including Email, Calendar, Contacts, Tasks and Notes) is a crucial communication tool at EEA for sharing information internally and externally.

After a test project of processing e-mail traffic for 20 EEA staff members through Microsoft's Office 365 service, EEA migrated its whole email infrastructure to it in February – March 2015. In total, there are 263 user mailboxes hosted in Office 365 mail system right now. Data is located in the primary data centre in Dublin or the secondary in Amsterdam.

Each user has the responsibility for the messages and attachments he or she is processing and sending out.

Front-End components:	Microsoft Outlook; Any standard HTTP browser; PDAs (i.e. iPhone)
Back-End components:	Microsoft Office 365 and related services.

4.2. Modalities for the processing operation

<input type="checkbox"/> Manual processing (please describe)	
<input checked="" type="checkbox"/> Automated processing (please describe)	<p>The system contains electronic messages, documents, calendar bookings and contact information that can be of both professional/business and private nature.</p> <p>The system is backed up on as a service by the Microsoft backup system and mailboxes are backed up to on premise via EEA's backup system.</p> <p>There is also a SPAM and virus filter shielding the server and filtering the traffic.</p>

4.3. Are the Personal data processed by an entity external to EEA ('processor')

<input checked="" type="checkbox"/>	<p>Yes, email addresses, messages and login credentials for the mailbox owners are processed in the Office 365 environment. (Please attach the contract or the legal act governing the carrying out of the processing) – <u>Commission framework contract DI/7360 – SIDE (see SIDE EUI-Corporate category list v12.pdf)</u></p> <p>Email messages are sent to external organisations or individuals.</p>
<input type="checkbox"/>	No

5. Lawfulness and purpose of the processing (Answering this question, please also verify and indicate if your processing has to comply with Articles 20 (Exemptions and restrictions) and 27 (Prior check by the EDPS) of the Regulation (EC) No 45/2001)

5.1. Legal basis

The processing operations of the EEA e-mail system 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 communications infrastructure including equivalent office automation technology.

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, these tasks must be supported by the appropriate functionalities of a modern and high performance e-mail system.

#### 5.2. Grounds for lawfulness

The data processing is considered lawful because it is necessary for the performance of a task carried out in the public interest based on 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).

#### 5.3. Purpose of the processing

- To enable electronic communication and exchange of electronic messages and attachments amongst EEA staff members and with external partners of the EEA.
- To offer to EEA e-mail system user the e-mail access to addresses of all internal correspondents and of main external partners (other institutions and bodies, Eionet members, etc ...)

### 6. Features of the processing operation

#### 6.1. Categories of data subjects concerned

Anybody whose e-mail address appears in the “To”, “From”, “CC” and/or “BCC” traffic fields of an e-mail message, as soon as these messages have been processed by the e-mail servers of the EEA (e.g. EEA staff and consultants, EC officials, Officials from other European institutions, bodies or agencies, external parties)

6.2. Categories of data (Please tick whichever is applicable)					
6.2.1. Data whose processing is prohibited subject to certain exceptions					
<input type="checkbox"/>	Data revealing racial or ethnic origin				
<input type="checkbox"/>	Data revealing political opinions				
<input type="checkbox"/>	Data revealing religious or philosophical beliefs				
<input type="checkbox"/>	Data revealing trade union membership				
<input type="checkbox"/>	Data concerning health				
<input type="checkbox"/>	Data concerning sex life				
6.2.2. Data whose processing is likely to present specific risks and is subject to prior checking by the EDPS					
<input type="checkbox"/>	Data relating to suspected offences, offences, criminal convictions or security measures				
<input type="checkbox"/>	Data relating to the evaluation of personal aspects of the data subject (e.g. abilities, efficiency and conduct)				
<input type="checkbox"/>	Data concerning linkages (not provided for by national or Community legislation) between data processed for different purposes				
<input type="checkbox"/>	Data relating to the exclusion of individuals from a right, benefit or contract				
6.2.3. Data processed in the context of internal telecommunications networks					
<input checked="" type="checkbox"/>	Traffic data				
<input type="checkbox"/>	Billing data				
<input checked="" type="checkbox"/>	Directories				
<input checked="" type="checkbox"/>	Others				
6.2.4. Other categories of data					
<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>o Email messages content (subject, body and attachments)</li> <li>o Email message traffic information (sender, recipient, date, size)</li> <li>o Email addresses and address book references</li> </ul> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">For the e-mail messages</td> <td>Message header (traffic information); subject; body and attachments</td> </tr> <tr> <td>For the address book</td> <td>First name, surname, title, office, mobile phone, initials, department, e-mail address</td> </tr> </table>	For the e-mail messages	Message header (traffic information); subject; body and attachments	For the address book	First name, surname, title, office, mobile phone, initials, department, e-mail address
For the e-mail messages	Message header (traffic information); subject; body and attachments				
For the address book	First name, surname, title, office, mobile phone, initials, department, e-mail address				

## 7. Retention practice of personal data

Address book data	<ul style="list-style-type: none"> <li>○ As long as the data subject is an EEA staff member + 3 months</li> <li>○ As long as the data subject is present in the address book of the respective other institutions, bodies or agencies</li> </ul>
Email messages	As long as the data subject is an EEA staff member + 3 months
Reports	Reports are accessible in the Online admin interface.
Logfiles	Mail activity logs are generated by EEA and processed in the log management system provided by CERT-EU (Splunk) for detecting security related issues.

## 8. Personal data processed for historical, statistical or scientific purposes (Please tick whichever is applicable or indicate 'n/a' (not applicable))

Purpose	Categories of data	Storage media
<input type="checkbox"/> Historical	n/a	<input type="checkbox"/> Anonymous <input type="checkbox"/> Encrypted
<input type="checkbox"/> Statistical	n/a	<input type="checkbox"/> Anonymous <input type="checkbox"/> Encrypted
<input type="checkbox"/> Scientific	n/a	<input type="checkbox"/> Anonymous <input type="checkbox"/> Encrypted

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

- Email messages: potentially anybody in the world having an email address.
- Reports: administrators of the system (for security and technical maintenance purpose only); investigation authorities; data subject concerned
- Address book data: other institutions, bodies or agencies. A copy of the EEA address book sent and imported into the Commission Address book.

### Remark:

Reports of various types are generated and sometimes consulted for production and security purposes.

Individual Email or mailboxes may need to be recovered or consulted on behalf of the data subject by staff with extended system access rights. Such cases can happen when;

- Email has been deleted or missing/undelivered
- Staff member is absent
- Security breaches such as virus infection or intrusions has taken place

This shall only take place after the data subject has unambiguously given his or her consent or in the case

of serious security threat after a virus infection or intrusions has taken place which threatens the EEA's infrastructure. In the latter case, the data subjects shall be informed accordingly. In any cases, the data controller shall consult the Data Protection Officer beforehand.

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

Yes

No transfer of personal data to third countries or international organisation

##### 10.1. Categories of data

As part of an email message: message header (traffic information), subject, body and attachments.

##### 10.2. Categories of recipients

By essence of an email system, email messages and attachments are sent out to and received from anybody around the world.

##### 10.3. Purpose of the transfer

The transfer (sending and receiving) of email messages and attachments is necessary for the performance of tasks carried out by EEA as mandated by Regulation (EC) No 401/2009 or other legal instruments.

See also Article 9(6) of Regulation (EC) No 45/2001.

##### 10.4. Modalities of the transfer (*automated/manual – Please describe*)

Automated transfer via public Internet lines

#### 11. Information given to the data subjects (Which communication(s) have you foreseen to inform the data subject(s) as described in Articles 11 & 12 of the Regulation (EC) No 45/2001)

See the "Policy for Email Usage at the EEA" and "Policy for private use of EEA IT and telephony equipment" on the EEA Intranet under "Working practicalities \ IT policies"

#### 12. 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*)

The data subject has full control over the email messages he/she has received in his/her mailbox, i.e. accessing, storing and deleting. Those rights do not apply to other copies of the same messages stored in somebody else mailbox.

No specific procedure has been put in place to enable data subjects to exercise their rights directly on their personal data in the email system.

As for incorrect data encoded in the address book, data subject may contact directly the mail administrator who can make the requested changes.

#### 13. 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*)

Email messages: each data subject has direct control on instances of data stored in his/her own mailbox.

Address book: the data is modified at the source (directory provided from HR systems)		
Categories of data	Blocking	Erasure
Any data asked for	Usually immediately but at maximum within 5 working days	Usually immediately but at maximum within 5 working days

<b>14. Measures to ensure security of the processing<sup>2</sup></b>
<b>14.1. Organisational measures (i.e. workflows, access rights and access control)</b>
Access control limited to authorised staff with extended access rights.
<b>14.2. Technical measures (i.e. use of secured equipment and IT tools, e.g. locked cupboards, secure connections, firewalls, etc ...)</b>
Hosted at an external data centre with secured room and limited access via firewalls and virus scanners.

Date

Signature of the data Controller

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<sup>2</sup> The information related to the security of processing will not be published in the register of the data operations. It will be examined in order to assess whether the implemented measures ensure a level of security appropriate to the risks represented by the processing and the nature of the personal data to be protected (Article 22 of Regulation (EC) No 45/2001.