European Environment Agency

# NOTIFICATION FORM

## FOR DATA PROCESSING OPERATIONS

Date of registration: 28.6.2011

Register No: IT1

## 1. Name of the data processing operation

Active directory service

## 2. Data Controller

| Programme or Group: | OSE2/Helpdesk |
|---|---|
| Function: | Head of Programme |
| Contact person: | Mr 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

Username, passwords, access control and other related information such as first name, surname, title, office, mobile phone, initials, department, e-mail address is processed in the Active Directory.

The EEA active directory available on the intranet is a referential repository to trace EEA departments and staff.

### 3.2. Modalities for the processing operation

| ☒ Manual processing (please describe) | Users are manually entered by staff in OSE2 |
|---|---|
| ☒ Automated processing (please describe) | The system contains directory information about users of EEA's internal IT systems and provides access information to computers and files. |

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

| ☐ | Yes |
|---|---|
| ☒ | No |

## 4. Lawfulness and purpose of the processing

### 4.1. Legal basis

o The processing is necessary for the internal functioning of the EEA.

o The processing operations of Directory and Access information 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.

o The Communication from the Commission, e-Commission 2006-2010: enabling efficiency and transparency stress to need to progress towards more integration and interoperability of corporate systems to provide intuitive and seamless services to staff and management[1];

o The employment and/or service contract with the EEA.

### 4.2. Grounds for lawfulness

The data processing is considered lawful because:

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 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

Individual users and groups of users are defined with meta data such as access rights, contract period and organisational belonging.

The processing consists in making available on the intranet of the EEA a combined electronic phonebook, address book – that may be enriched by an ID photograph according to each individual's choice – and organisational chart of the EEA in which each member of staff appears. The processing helps EEA staff identify and find details about their correspondents and colleagues within EEA.


## 5. Features of the processing operation

### 5.1. Categories of data subjects concerned

EEA Staff (statutory and non-statutory) and contracted consultants, namely people using EEA's internal IT systems

### 5.2. Categories of data

| | |
|---|---|
| ☒ | User data related to access rights to the EEA network and other related information such as name (title, first name and last name), initials, job title, job description, department, |

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[1] E-Commission 2006-2010 – Memorandum November 2005, Ref. C(2005) 4473, paragraph 3.1.3, page 7.

| | office location, telephone number(s) (internal and mobile where applicable), ID photograph where the data subject has expressed his/her consent for publication. |
|---|---|

## 6. Retention practice of personal data

Retention time of backup data is **3 weeks**. Entered users in the EEA active directory are disabled when their service is ended. Deletion should follow the same time lines as SIC and Personnel files.

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

| Purpose | Categories of data | Storage media |
|---|---|---|
| ☐ Historical | Not applicable | ☐ Anonymous<br>☐ Encrypted |
| ☒ Statistical | Log files | ☒ Anonymous<br>☐ Encrypted |
| ☐ Scientific | Not applicable | ☐ Anonymous<br>☐ Encrypted |

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

Technical staff in the Helpdesk and users of EEA internal systems and Intranet (i.e. all active EEA staff member and contracted consultants); contracted security guards

## 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)

As part of the newcomers programme, all EEA staff members are provided with a general presentation of the IT systems available and with general information on data protection and they may acquaint themselves with data protection through the information available on the EEA intranet.

A specific privacy statement is available on the EEA intranet (see annex 1 attached 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*)

Each member of staff can directly check his/her personal data on-line. Data subject have a right to access, update and rectify their personal data at any time.

Any request for access, update or rectification of personal data shall be addressed in writing to the system administrator (helpdesk) at the following address: helpdesk@eea.europa.eu.

## 12. Time limits for blocking and erasure of the different categories of personal data

| 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 |