



NOTIFICATION FORM

FOR DATA PROCESSING OPERATIONS

Date of registration: 28.6.2011

Register No: IT3

1. Name of the data processing operation

E-mail services

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

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

Processing of the e-mail traffic from and to the mailboxes of EEA staff.

Each e-mail system user has the responsibility for the messages and attachments he is processing and sending out.

Front-End components:	Microsoft Outlook; Any standard HTTP browser; PDAs (i.e. Qtek)
Back-End components:	Microsoft Exchange; Zantas EAS (optimized SAN storage for messages); Cycos MRS; Microsoft Antigen; Vamsoft ORF; Hypersoft; NetIQ; MOM; Internal processes to cover address book data exchanges and management (ADPS)

3.2. Modalities for the processing operation	
☐ Manual processing	
☒ Automated processing	The system contains electronic messages, documents, calendar bookings and contact information that can be of both professional/business and private nature. The system is both backed up on separate disks and tapes. In association to the Email service there is an Email archive service that extracts all sent and received mails via a journaling mechanism.
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
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. Furthermore, the European Code of good administrative behaviour, applicable to the EEA pursuant to a Decision of its Management Board adopted on 22 June 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: ○ 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 ○ it is necessary to ensure compliance with a legal obligation to which the controller is subject (Article 5(b) of Regulation (EC) No 45/2001)
4.3. 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...)

5. Features of the processing operation

5.1. 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 message 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)

5.2. Categories of data

Data processed in the context of internal telecommunications networks

☒ Traffic data

☐ Billing data

☒ Directories

Other categories of data

- ☒
- Email messages content (subject, body and attachments)
 - Email message traffic information (sender, recipient, date, size)
 - Email addresses and address book references

For the e-mail messages	Message header (traffic information); subject; body and attachments
For the address book	First name, surname, title (gender), informatics login, office phone, office location, e-mail address

6. Retention practice of personal data

Address book data	○ As long as the data subject is a EEA staff member ○ As long as the data subject is present in the address book of the respective other institutions, bodies or agencies
Email messages	○ 35 days maximum after deletion by the user (backup rotation time) ○ Users may force the deletion of EAS-stored messages with appropriate tools
Log files	Traffic log files are kept for 6 months. Anything that has to be kept longer (e.g. for statistical purposes) is made anonymous.

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

Purpose	Categories of data	Storage media
☐ Historical	Not applicable	☐ Anonymous ☐ Encrypted
☒ Statistical	Log files	☒ Anonymous ☐ Encrypted
☐ Scientific	Not applicable	☐ Anonymous ☐ Encrypted

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

- Email messages: potentially anybody in the world having an email address.
- Log files (traffic data): administrators of the system (for technical maintenance purpose only); investigation authorities; data subject concerned
- Address book data: other institutions, bodies or agencies

Remark:

Log files 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.

9. Proposed transfer of personal data to third countries or international organisations	
☒ Yes	☐ No transfer of personal data to third countries or international organisation
9.1. Categories of data	
As part of an email message: message header (traffic information), subject, body and attachments.	
9.2. Categories of recipients	
By essence of an email system, email messages and attachments are sent out to and received from anybody around the world.	
9.3. 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.	
9.4. Modalities of the transfer (<i>automated/manual – Please describe</i>)	
Automated transfer	

10. Information given to the data subjects as described in Articles 11 & 12 of the Regulation (EC) No 45/2001)
See the Policy for e-mail usage at the EEA available on the EEA intranet under 'Work Practicalities' and reproduced as annex 1 to this notification. See also the <u>TOP 15 Guidelines for an effective email use at the European Commission</u>

11. Procedures to enable data subjects to exercise their rights (<i>as indicated in Articles 13 to 19 of the Regulation (EC) No 45/2001, i.e. access, rectification, blocking, erasure, objection</i>)
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 log-files. As for incorrect data encoded in the address book, data subject may contact directly the mail administrator who can make the requested changes.

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

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