



NOTIFICATION FORM

FOR DATA PROCESSING OPERATIONS

- To be filled out by the Data protection Officer -

Date of registration: 13.3.2015

Register No: IT9

1. Name of the data processing operation

Export of EEA's directory service data to the EC authentication service system(ECAS)

2. Data Controller

Programme or Group:	IDM1/Helpdesk
Function:	Head of Group
Contact person:	Örjan Lindberg

3. Description of the processing operation

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

Data from EEA's directory service (Active Directory) and SIC is exported regularly to the Commission's ECAS to help EEA staff gain access to various systems in the Commission e.g. CircaBC, e-Learning catalogue and in particular JSIS online from within the EEA's network or from the public internet (the latter requires the submission of a mobile number for a two factor login authentication).

The export consists of Moniker (User name), employee number, birthdate, e-mail address, surname, given name and usage constraints and on a voluntary basis the staff members mobile number (EEA mobile or private).

The export is sent via FTP over sTESTA to a site in the Commission for automatic import into the ECAS at the Commission's Identity & Access Management Service.

3.2. Modalities for the processing operation

<input checked="" type="checkbox"/> Manual processing	The process is initiated manually about once a month
<input checked="" type="checkbox"/> Automated processing	The import is automated

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

The directory information is processed by the Commission.

4. Lawfulness and purpose of the processing

4.1. Legal basis

The processing operations of directory service and sharing related contact information is advantageous 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.

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
- 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 enable access to Commission Intranet services that require login (over sTESTA user name and password is enough but from the public Internet a two factor login is requires) for EEA staff, in particular JSIS online.

5. Features of the processing operation

5.1. Categories of data subjects concerned

Anybody whose directory data appears in the exported file which in principle could be all active EEA statutory staff (staff with valid directory data).

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

Email addresses, mobile phone number (voluntary) and address book references

6. Retention practice of personal data

As long as the data subject is an EEA staff member

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

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

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

Responsible staff in the Commission's Identity & Access Management service

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

See the privacy statement for users registered with the European Commission's Identity Management service available at <https://webgate.ec.europa.eu/cas/privacyStatement.html>

11. Procedures to enable data subjects to exercise their rights

Incorrect data encoded in EEA's directory service or SIC, data subjects may contact directly the Human Resource Management group within the Administrative services or Helpdesk at EEA who can make the requested changes.

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*)

Directory data: the data is modified at the source (directory provided from HR systems and Active Directory).

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