

*(To be filled out in the EDPS' office)*  
**REGISTER NUMBER: 1416**

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**NOTIFICATION FOR PRIOR CHECKING**

**DATE OF SUBMISSION: 01/12/2016**

**CASE NUMBER: 2016-1113**

**INSTITUTION: EBA**

**LEGAL BASIS: ARTICLE 27-5 OF THE REGULATION EC N° 45/2001<sup>(1)</sup>**

**INFORMATION TO BE GIVEN<sup>2</sup>**

1/ NAME AND ADDRESS OF THE CONTROLLER

ADAM FARKAS, EUROPEAN BANKING AUTHORITY, FLOOR 46, ONE CANADA SQUARE,  
CANARY WHARF, LONDON, E14 5AA, UNITED KINGDOM

2/ ORGANISATIONAL PARTS OF THE INSTITUTION OR BODY ENTRUSTED WITH THE PROCESSING OF  
PERSONAL DATA

EBA Operations Department (Human Resources/IT)

3/ NAME OF THE PROCESSING

Maintenance of up to date information on EBA staff as required by the ECAS (European  
Commission Authentication Service) system for EBA users and providing this information to the  
ECAS system (managed by EC DG DIGIT/Identity & Access Management (IAM) Service Desk).

EBA staff members are required to have ECAS user accounts in order to access European  
Commission services such as those offered by JSIS. In order for EBA staff to be able to access their  
accounts from outside the EBA office, the Operations Department would need to ask DIGIT  
COMREF, the provider of ECAS, to enable the mobile telephone numbers of those staff members  
who wish to access their ECAS accounts remotely, i.e. from outside the EBA offices.

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<sup>1</sup> OJ L 8, 12.01.2001.

<sup>2</sup> **Please attach all necessary backup documents**

#### 4/ PURPOSE OR PURPOSES OF THE PROCESSING

The personal data is collected and processed to ensure that up-to-date information on all active EBA staff is available at the ECAS system in order to enable EBA staff to create and use their ECAS account, to access services of the European Commission such as JSIS, myIntracomm, ABAC, CIRCABC etc, and to access these services from outside the EBA offices.

#### 5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

The information required by the ECAS system for EBA users is exported from the HR “Allegro” system into an MS Excel file, which contains information about staff such as user name, staff number, email addresses etc. A full list of the data fields exported from Allegro is given in item 6/ under the heading “**Allegro Export**”.

A new version of the above mentioned Excel sheet is generated every 4 weeks by Human Resources who then send it to IT Support who transform it into a data format that can be read by the ECAS system (for more information please see the attached document by DIGIT IAM at the end of item /5). This process also removes entries of staff who are seconded national experts or trainees and entries of staff whose contracts haven’t started yet.

A full list of the data fields after the transformation can be found in item 6/ under “**ECAS Import**”. All files are stored for processing on the file server in a folder to which only IT administrators and HR have access.

Once the data is prepared for ECAS, the latest file is then uploaded to a password protected and encrypted FTP server at the European Commission where the contents are then automatically imported into the ECAS system, where ECAS accounts for EBA users are – depending on the information in the file - created, updated or deleted.

As defined by EC DG DIGIT/Identity & Access Management (IAM) the ECAS file to be provided to them on a regular basis needs to contain all required data (see below) on all active EBA staff (Contract Agents and Temporary Agents) in order to confirm the complete list of ECAS accounts that need to remain open (instead of only providing an overview of changes, e.g. newcomers, leavers etc.)

The required data fields:

- ECAS user name,
- SYSPER employee number,
- Date of birth,
- E-mail address,
- Surname,
- Given name
- Usage constraints

Among the optional fields that are being transmitted to the ECAS system in order to facilitate access to EC applications from outside the office are

- Mobile1CountryCode
- Mobile1Number

A description of the required and optional data fields is contained in the attached DIGIT IAM document.

[...]

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA (including, if applicable, special categories of data (Article 10) and/or origin of data).

**Allegro Export**

- Employee Number
- First Name
- Last Name
- Email
- Login
- Office Mobile
- Date of Birth
- Statutory Link
- Admin status date of effect

**ECAS Import**

- Moniker
- Employee Number
- Birth Date
- mail
- Surname
- Given Name
- Usage Constraints
- Mobile1Country Code
- Mobile1Number

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

Staff/data subjects are informed about the processing of their personal data when they join the EBA. A specific communication is sent from Human Resources via an email to individual newcomers when they join the EBA. Also, information on the ECAS account and a privacy statement is published on the Human Resources' section on the EBA intranet website.

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

(Rights of access, to rectify, to block, to erase, to object)

As illustrated in the Privacy Statement, staff members have the right to rectification of their personal data and the right of recourse at any time by addressing their request to the EBA DPO ([dpo@eba.europa.eu](mailto:dpo@eba.europa.eu)). Should any EBA staff member wish not to have an ECAS account, they are requested to inform Human Resources at [hrTeam@eba.europa.eu](mailto:hrTeam@eba.europa.eu) or [...] from the HR Team. At any time, any EBA staff members can express their wish to stop the transfer of his/her personal data.

9/ AUTOMATED / MANUAL PROCESSING OPERATION

Manual Operation.

10/ STORAGE MEDIA OF DATA

The data is exported by Human Resources into MS Excel Spreadsheets, stored in a protected folder in the IT area file server. The transformation of the data structure produces text files which are stored at the same protected location. After transformation into the format required by the ECAS system, the current file is uploaded to a password protected FTP server via SFTP.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

The processing is necessary for compliance with a legal obligation to which the controller is subject. The legal basis, EUSR (in particular Article 72 on Sickness Insurance).

Service Level Agreement (SLA) concerning the collaboration of the EBA with the Office of Administration and Payment of Individual Entitlements (PMO) (in particular Art 11 on Sickness Insurance).

The processing is necessary for the performance of a task carried out in the public interest and necessary for the management and functioning of the institution.

Data subject has unambiguously given his/her consent. The private mobile number is collected orally and/or sent by email to the HR functional mailbox.

12/ THE RECIPIENTS OR CATEGORIES OF RECIPIENT TO WHOM THE DATA MIGHT BE DISCLOSED

Human Resources, IT Support.

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

A new updated data file (Excel spreadsheet) is generated every 4 weeks.

Each new update is stored on the file share in the protected IT folder as a new version of the file with access rights only to IT staff. The personal data will only be kept for no longer than is necessary for the purposes for which the data were collected or for which they are further processed.

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS

The Personal Data should be kept for no longer than is necessary for the purpose for which the data were collected or for which they are further processed.

*(Please, specify the time limits for every category, if applicable)*

14/ HISTORICAL, STATISTICAL OR SCIENTIFIC PURPOSES

*If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification.*

15/ PROPOSED TRANSFERS OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

The data will be transferred to the European Commission DG DIGIT/Identity & Access Management (IAM) Service Desk of European Commission, Brussels/Luxembourg.

16/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING (*Please describe*):

AS FORESEEN IN:

↑ Article 27.2.(a)

*Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,*

Yes, health data would be processed.

↑ Article 27.2.(b)

*Processing operations intended to evaluate personal aspects relating to the data subject,*

No

↑ Article 27.2.(c)

*Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,*

No

↑ Article 27.2.(d)

*Processing operations for the purpose of excluding individuals from a right, benefit or contract,*

No

↑ Other (general concept in Article 27.1)

No

17/ COMMENTS

The Identity and Access Management Service – Data Transfer Process document is enclosed.

PLACE AND DATE: LONDON, UNITED KINGDOM 30 NOVEMBER 2016

DATA PROTECTION OFFICER: JOSEPH MIFSUD

INSTITUTION OR BODY: EUROPEAN BANKING AUTHORITY