

EDPS record of processing activity

Record of EDPS activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

Nr	Item	Description
		Business Continuity Plan
1.	Last update of this record	12-11-2018
2.	Reference number	33
3.	Name and contact details of controller	European Data Protection Supervisor (EDPS) Postal address: Rue Wiertz 60, B-1047 Brussels Office address: Rue Montoyer 30, B-1000 Brussels Telephone: +32 2 283 19 00 Email: edps@edps.europa.eu Responsible department or role: edps-lso@edps.europa.eu Contact form for enquiries on processing of personal data to be preferably used: https://edps.europa.eu/node/759
4.	Name and contact details of DPO	edps-dpo@edps.europa.eu
5.	Name and contact details of joint controller (where	N/A



Nr	Item	Description
	applicable)	
6.	Name and contact details of processor (where applicable)	-
7.	Short description and purpose of the processing	<p>The Business Continuity Plan (BCP) is a plan to deal with possible business continuity incidents relating to the location of the EDPS premises in MTS building and to the infrastructures in there The purpose of the BCP and the associated Guidance is to provide the EDPS with a structured approach and guidance to Business Continuity (BC), because we need to plan and prepare for unforeseen disruptions to our activities.</p> <p>The purpose of the BCP and the associated Guidance is to provide the EDPS with a structured approach and guidance to Business Continuity.</p> <p>The BCP is in place to ensure that the institution is able to continue operation to the extent possible whatever the nature of a major disruption.</p> <p>The purpose of the processing is to enable the institution, in the context of a BCP, to contact each EDPS staff member where necessary. All personal data submitted will be used for the sole and exclusive purpose of informing staff in case of BCP action.</p>
8.	Description of categories of persons whose data the EDPS processes and list of data categories	<p>All staff members of the EDPS.</p> <p>The personal data that are gathered during the processing operations are the following:</p> <ul style="list-style-type: none"> • Name and surname • The list of professional phone numbers with professionals e-mails and location rooms • Personal mobile phone numbers • The personal data contained in the BCP document (some names and contact details of key actors) as well as the EP BCP document (see also section 10). <p>Private phone numbers are stored in the emergency phone, kept by the LSO/BCP Desk Officer and used only in cases of concrete emergencies causing a work disruption. When printed out they will be put in two</p>



Nr	Item	Description
		<p>sealed envelopes (entrusted to the Director and the BC Desk officer), and in an Excel file on a USB stick to be locked away.</p> <p>As well as general communications from the BC Duty Officer by SMS and/or email, the Director and Heads of Units/Sectors can communicate with and inform the members of their teams by mobile phone.</p> <p>The Director and Heads of Units/Sectors can send e-mail with information to staff using staff professional e-mails.</p> <p>Staff with questions can call back on the work phone of Heads of Units/Sectors only if they have received a message from their Head</p> <p>In addition to professional phones, there are a laptop and a token for secure remote connection at the Desk Officer's house</p>
9.	Time limit for keeping the data	<p>Personal data will be kept as long as the staff member is a member of the EDPS. As soon as a staff member leaves the EDPS, all his/her personal data will immediately be removed from the phone lists both in the emergency EDPS mobile phone and in the 2 sealed envelopes.</p>
10.	Recipients of the data	<p>The recipients of the contact details are:</p> <ul style="list-style-type: none"> - the BC Duty Officer and the BC Desk Officer - the Director and the HoU/S, each limited to the contact details of their relevant staff. <p>The Business continuity plan, with the contact details of the key business continuity actors, is sent also to the European Parliament security services as the EDPS building belongs to the EP. The BCP relies only on having a permanent and reliable contact with the security services of the Parliament. The reverse scenario, where we receive the BCP of the EP with their key actors' contact details, should also be taken into account where it is the Duty officer who informed EP security on an incident which will trigger measures from EP side.</p> <p>Personal mobile phones data will never be disclosed to any third parties.</p>
11.	Are there any transfers of	No such transfers.



Nr	Item	Description
.	personal data to third countries or international organisations? If so, to which ones and with which safeguards?	
12.	General description of security measures, where possible.	In order to safeguard personal data against any possible misuse or unauthorised access, electronic and paper information is accessible with a restricted access only (possible use of password for excel files to be held in secure hard drives and sealed envelopes for paper files), and only to people having a need to know.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	Please refer to the BCP data protection notice, which is published on the EDPS intranet. The EDPS will regularly (at least once per year) request staff members to update their data.

