



## **MANAGEMENT OF CORPORATE MOBILE DEVICES AND LAPTOPS**

### **DATA PROTECTION NOTICE**

#### **Short description of the processing activity:**

The purpose of the processing operation is to provide mobile devices (tablets and mobile phones/smartphones) and laptops to EDPS staff for work related purposes.

Your personal data are processed based on [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 Text with EEA relevance ('the Regulation').

The following information is provided as established in Articles 15 and 16 of the Regulation.

#### **Who is the 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](mailto:edps@edps.europa.eu)

Responsible department or role: Human Resources, Budget, Administration (HRBA) Unit and Technology and Privacy Unit (TP)  
Contact us: [EDPS-IT@edps.europa.eu](mailto:EDPS-IT@edps.europa.eu)

For more information on the EDPS please consult our website: <https://edps.europa.eu>.  
Contact form for enquiries on processing of personal data to be preferably used:  
<https://edps.europa.eu/node/759>.

#### **Processor:**

European Parliament (EP) - DG ITEC.  
Bruxelles - Brussels  
Rue Wiertz, Wiertzstraat  
B-1047 Bruxelles  
Central Switchboard  
+32 / (0) 2 28 4 21 11  
Contact for enquiries: EP DPO - <http://www.europarl.europa.eu/at-your-service/en/stay-informed/data-protection>

### **What personal data do we process and who can access it?**

The following personal data of EDPS staff using a device provided by the EDPS for work related purposes are being processed in this context:

- Name, job title
- Type of contract (official, contractual, trainee, etc.)
- In the case of a mobile device (tablet or mobile phone/smartphone), personal data of the staff processed within the mobile device in the context of a data backup and restore, upon staff request

Personal data could be accessed, on a strict need-to-know basis and depending on particular situations, by the EDPS IT Support Agent, the HRBA relevant official and his/her back up. The European Parliament's DG ITEC could access also certain personal data in the context of the IT support service provided to the EDPS.

### **Where did we get your personal data?**

The data are collected directly from EDPS staff members.

### **Why do we process your personal data and under what legal basis?**

The purpose of the processing operation is to provide mobile devices (tablets and mobile phones) and laptops to EDPS staff for work related purposes.

All staff members are assigned a personal laptop or hybrid laptop upon entry into service, to be used as the primary IT tool for accessing the EDPS IT working environment (e.g. e-mail, documents, Case Management System (CMS), the Intranet, etc.).

For specific use cases (such as going to mission), most of the EDPS staff members are entitled to ask for a tablet. Only the Supervisor, the managerial staff and few other staff members (such as the LISO and the LSO) are entitled to use mobile phones and smartphones for service reasons (for example, for business continuity reasons).

The EP's DG ITEC provides to the EDPS staff member the device that is identified in the inventory (number linked to the name of the person).

The EDPS IT Support Agent and staff in HRBA will receive a copy of the list of the devices given.

For the processing of personal data carried out by EP services, on behalf of the EDPS, please refer to the [EP's records](#):

- [DG ITEC ICT infrastructure provision and supervision operations related to European Parliament's ICT equipment, networks and systems \(running on DG ITEC ICT infrastructure\)](#)
- [Mobile Device Management](#)
- [DG ITEC backup operations on European Parliament's ICT equipment, networks and systems \(running on DG ITEC ICT infrastructure\)](#)
- [DG ITEC helpdesk ticketing system - EPSD](#)

The lawfulness is based on:

- Article 5.1.(a) of the Regulation ("*processing is necessary for a performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body*"). In particular, the processing is necessary "*for the management and functioning of those institutions and bodies*" (Recital 22 of the Regulation).
- Article 5.1(d) of the Regulation ("*the data subject has given consent to the processing of his or her personal data for one or more specific purposes*"). The consent legal basis is used for backup and restore, only in the case of a mobile device, namely tablet or mobile phone/smartphone.

The controller-processor relationship between the EDPS and the EP is regulated by the following agreements:

- The Inter-institutional Cooperation Agreement between the EDPS and the Secretary-General of EP signed in June 2004 and afterwards renewed several times (e.g. 2006, 2011, 2013) and
- the Annex I Service Level Agreement (SLA) between the EDPS and the DG ITEC of the EP signed in May 2018<sup>1</sup>.

For more information on the applicable procedures, please refer to the [Rules on the European Parliament's allocation of mobile telephones and smartphones to officials](#) and to the [general webpage of EP intranet](#).

### **How long do we keep your personal data?**

Personal data will be kept as long as the staff member works for the EDPS. As soon as a staff member leaves the EDPS, all his/her personal data will be removed without delay.

More specifically, in accordance with the Record on [Mobile Device Management](#), regarding data in EP's mobile devices, user information are kept in the EP Mobile Device Management Platform (EP MDM) as long as the user account is active in the EP Active Directory (corporate IT account directory), and then automatically deleted after this period.

Furthermore, device data, work apps data and diagnostic data are kept as long as the device is registered (enrolled) in the EP MDM. When the device is un-enrolled from the MDM the respective data is deleted from the MDM by a clean-up performed once per week.

In accordance with the Records on [DG ITEC ICT infrastructure provision and supervision operations related to European Parliament's ICT equipment, networks and systems \(running on DG ITEC ICT infrastructure\)](#) and [DG ITEC backup operations on European Parliament's ICT equipment, networks and systems \(running on DG ITEC ICT infrastructure\)](#), regarding backup data, as electronic files stored on EP's ICT equipment, networks and systems running on DG ITEC ICT infrastructure, log files and backup data are kept in the backup system (managed by DG ITEC) until 1 year (from the creation of the backup) on the storage space dedicated to backups. Backups take place every day and are automatically executed.

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<sup>1</sup> Modalities on the provision of services of the Directorate-General for innovation and technical support of the European Parliament and to the European Data Protection supervisor, signed on 22.05.2018.

### **What are your rights regarding your personal data?**

You have the right of access to your personal data and to relevant information concerning how we use it. You have the right to rectify your personal data. Under certain conditions, you have the right to ask that we delete your personal data or restrict its use. You have the right to object to our processing of your personal data, on grounds relating to your particular situation, at any time. We will consider your request, take a decision and communicate it to you. Under certain conditions, you have the right to ask that we delete your personal data or restrict its use.

You can send your request to the EDPS by post in a sealed envelope or use our contact form on the EDPS website (see section on contact details below).

### **How to withdraw your consent and the consequences of doing this**

When using a tablet or mobile phone, the staff member has the right to withdraw his/her consent to the restore and back up the data at any time by liaising directly to the DG ITEC services.

### **Automated decision-making**

n/a

### **You have the right to lodge a complaint**

If you have any remarks or complaints regarding the way we process your personal data, we invite you to contact the EDPS DPO (see section on contact details [below](#)).

You have, in any case, the right to lodge a complaint with the EDPS as a supervisory authority: [https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en](https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en).

### **Contact details for enquiries regarding your personal data**

We encourage you to contact us using the EDPS contact form, selecting 'My personal data' as the relevant subject: <https://edps.europa.eu/node/759>

If you wish to contact the EDPS DPO personally, you can send an e-mail to [DPO@edps.europa.eu](mailto:DPO@edps.europa.eu) or a letter to the EDPS postal address marked for the attention of the EDPS DPO.

EDPS postal address: European Data Protection Supervisor, Rue Wiertz 60, B-1047 Brussels, Belgium

You can also find contact information on the EDPS website: [https://edps.europa.eu/about-edps/contact\\_en](https://edps.europa.eu/about-edps/contact_en).