

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
		EDPS Cloud
1.	Last update of this record	18/01/2024
2.	Reference number	66
3.	Name and contact details of controller	<p>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</p> <p>Responsible department or role: EDPS Technology and Privacy Unit, tech-privacy@edps.europa.eu</p> <p>Contact form for enquiries on processing of personal data to be preferably used: https://edps.europa.eu/node/759</p> <p>European Commission: Informatics (DIGIT) is a separate controller regarding EU-Login Contact: DIGIT-DATA-PROTECTION-COORDINATOR@ec.europa.eu For more information, see DPR-EC-03187.1</p>
4.	Name and contact details of DPO	dpo@edps.europa.eu
5.	Name and contact details of joint	Not applicable



Nr.	Item	Description
	controller (where applicable)	
6.	Name and contact details of processor (where applicable)	TAS France SASU https://www.tasgroup.fr 15 traverse des BRUCS, 06560 VALBONNE – SOPHIA ANTIPOLIS, FRANCE
7.	Short description and purpose of the processing	<p>The EDPS cloud collaboration workspace provides:</p> <ul style="list-style-type: none"> • file sharing and syncing • number-independent interpersonal communications service (NIICS, chats and video calls) • personal and shared information manager (calendar, address book, TODOs) • collaborative document editing (Collabora Office, Nextcloud Collectives, Nextcloud Tables) • project management based on kanban boards • password manager with sharing functionality • survey/polling tool • backups, security, access management and maintenance to ensure the security of all other processing activities <p>These generic working tools help the EDPS to achieve a number of tasks, such as granular managing of tasks, hosting internal and external meetings, sharing documents with internal and external stakeholders, and drafting of minutes, audit reports, opinions, guidelines, letters, as well as press publications. More specific purposes are covered in a distinct data processing records.</p> <p>The cloud workspace is accessed through the web browser and in the case of chat groups and virtual meetings also through the Nextcloud Talk mobile application (for iOS and Android). Both store account credentials for security purposes.</p>
8.	Description of categories of persons whose data the EDPS processes and list of data categories	<p>The <u>categories of data subjects</u> whose personal data is processed are:</p> <ul style="list-style-type: none"> • staff of the EDPS using or managing the provided services, • recipients of communications by the EDPS included in provided services,



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		<ul style="list-style-type: none"> • individuals included in the documents handled by the EDPS in provided services, • individuals involved in collaborations lead or supported by the EDPS, • individuals participating in conference calls and chats. <p>Further information on the categories of data subjects whose personal data is processed in the different services and service components provided under this Agreement can be found in the tables in document “Nextcloud-Database-Tables” (Annex Error: Reference source not found of the Global ELA) that is also annexed to this record and published on the software vendor’s website.</p> <p><u>Categories of personal data processed:</u></p> <p>The necessary data for EDPS staff and staff of EUIs to access the EDPS Cloud with EU-Login are:</p> <ul style="list-style-type: none"> • internet connectivity data (device type, user agent, IP address) and session tokens • display name (name and surname) as provided by the HR Systems, corporate email address, username and account and user groups imported upon from EU-Login upon an EU Cloud authentication request. <p>The necessary data for guest users accessing via shared link:</p> <ul style="list-style-type: none"> • internet connectivity data (device type, user agent, IP address) and session tokens • self-chosen display name (nickname) • possibly email address if guest user access shared via email <p>More data categories may optionally be processed depending on the use of the EDPS Cloud:</p> <ul style="list-style-type: none"> • profile data telephone number, user status message, user avatar, user location and time zone, user language, organisation, role, headline, biography, working hours • user notification preferences • address book with name, surname, email address, telephone number and/or other



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		<p>contact details of address book contacts;</p> <ul style="list-style-type: none"> • chats with chat data consisting of a chat topic, recipient contact data (display name, email for EU-Login users), chat messages (including images, audio recordings and file attachments) and reactions (emoji), as well as logs on recipients joining or leaving; for calls, also participant audio and video streams, as well as shared screens; • kan-ban boards with collaborator data (display name, email for EU-Login users), task descriptions, task allocations, task progress and status, as well as task comments and file attachments; • password entries in the password manager (usernames, passwords, descriptions); • replies to the survey/poll tool (depending on the survey design; e.g. availability data, personal preferences); • folders and files that may contain operational personal data, as defined in Article 3(2) of the Regulation, as provided by individuals or third parties (e.g. other institutions), or collected by EDPS to carry out institutional tasks such as complaints, requests for information or advice, requests for own personal data¹; alongside file access management data (recipients and recipient groups, access rights), links to related resources (including chats), user comments, user file tags, and historic file versions. <p>For each EU-Login user, the EDPS Cloud stores an activity log listing time-stamped changes to own resources and resources with access granted from others. The following actions are covered:</p> <ul style="list-style-type: none"> • creating, modifying, renaming, deleting, (un)sharing, and (un)tagging of documents • creating, modifying, deleting of contacts in the address book • creating, modifying, deleting of calendar events and calendar to-dos • creating, modifying, deleting of kan-ban boards and their kan-ban tasks • new comments • changes in work flows (approval work flow)

¹ A description of these data is also defined in the records of the operational processes supported by those documents.



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		<ul style="list-style-type: none"> • new chat messages or calls (to be found in the notifications list) <p>Further information on the categories of personal data processed in the different services and service components provided under this Agreement can be found in the tables in document “Nextcloud-Database-Tables” (Annex Error: Reference source not found of the Global ELA) that is also annexed to this record and published on the software vendor’s website.</p> <p><u>Special categories of personal data must not be processed in the EDPS cloud, in accordance with the use policy.</u></p>
9.	Time limit for keeping the data	<p>The personal data of EDPS staff members are actively processed in the system for the duration of their employment relation with EDPS, for user accounts, allocation of cases and workflow related activities. Once a staff member leaves the EDPS, the user account is deactivated, so that the system cannot be accessed through it anymore; the name of the staff member remains in the system in connection with his/her cases (for accountability and corporate memory reasons), but cannot be further used for allocating new cases or activities.</p> <p>The overall time limits for which the documents and files are kept in the EDPS Cloud depend on the purpose. According to the EDPS Cloud Use Policy, documents must be deleted as soon as the active drafting or collaboration phase ended. Documents belonging to the knowledge database are stored as long as they are relevant for the work of the EDPS. The specific retention period of the personal data contained in the documents is also defined in the specific records of the operational processes supported by those documents.</p> <p>The retention period of diagnostic data such as internet connectivity data (access logs) for the purpose of IT security investigations is one year.</p> <p>For the retention period applicable to EU-login, please refer to the EC record DPR-EC-03187.1 and the EU-login privacy statement.</p> <p>See also column “Data Retention” in the document “Nextcloud-Database-Tables” annexed to this record and also published on the software vendor’s website.</p>



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10.	Recipients of the data	<p>Users may on a case by case basis give access to internal or external collaborators.</p> <p>The European Union's Computer Emergency Response Team (CERT-EU) receives diagnostic data that match regularly updated IT security queries.</p> <p>The European Commission, as controller of EU Login, in accordance with the EC record DPR-EC-03187.1 and the EU-login privacy statement.</p>
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No transfers outside of EU/EEA area are taking place.
12.	General description of security measures, where possible.	Access management with strong authentication for account holders, annual certification exercises, audit trails; preventive, adaptive and evolutive maintenance; 24/7 security monitoring.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	Data Protection Notice online: https://edps.europa.eu/data-protection/our-work/publications/data-protection-notices-records/2023-01-27-edps-cloud-data-protection-notice_en

