



EUROPEAN DATA PROTECTION SUPERVISOR

PROCESSING OF PERSONAL DATA IN THE COLLABORATIVE CLOUD WORKSPACE

'EDPS CLOUD'

DATA PROTECTION NOTICE

The EDPS Cloud is a generic collaborative cloud workspace to support the EDPS in various tasks. It offers the following functions to the EDPS staff members and upon invitation to their external collaborators:

- file sharing and syncing,
- chats and video calls (so called number-independent interpersonal communications service),
- personal and group 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,
- back-ups, security, access management and maintenance to ensure the security of all other processing activities.

The EDPS uses the EDPS Cloud for:

- granular managing of projects with kan-ban boards and to-do lists,
- managing passwords,
- organising surveys/polls,
- chat groups and virtual meetings with internal and external collaborators,
- sharing documents with internal and external collaborators, in line with the EDPS cloud acceptable use policy, and
- drafting of meeting minutes, audit reports, opinions, guidelines, letters, as well as press publications.

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.

More specific use cases employing the EDPS Cloud may be covered in distinct data protection notices.

For the provision of the EDPS Cloud, your personal data is processed in accordance with [Regulation \(EU\) 2018/1725](#) (hereinafter ‘the Regulation’).

We provide you with the information that follows based on Articles 15 and 16 of the Regulation.

Who is the controller?

The controller is the 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: Technology & Privacy Unit, EDPS-IT@edps.europa.eu

The European Commission - DG DIGIT is the controller of EU-Login. For more information, please refer to the EC record [DPR-EC-03187.1](#) and the [EU-login privacy statement](#).

Contact form for enquiries on processing of personal data to be preferably used: <https://edps.europa.eu/node/759>.

Who is/are the processors?

TAS France SASU <https://www.tasgroup.fr>

What personal data do we process and who has access to this personal data?

We process personal data of:

- staff of the EDPS using or managing the provided services,
- recipients of communications by the EDPS included in provided services,
- 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.

The necessary data for EDPS staff and staff of EUIs to access the EDPS Cloud with EU-Login are:

- 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.

The necessary data for guest users accessing via shared link:

- 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

More data categories may optionally be processed depending on the use of the EDPS

Cloud:

- 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 contact details of address book contacts;
- 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;

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:

- 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)
- new chat messages or calls (to be found in the notifications list)

When EU-login users create resources in or upload resources to the EDPS Cloud, their access is by default limited to them. Specific group folders, calendars, kan-ban boards or chats give access to the respective user group. Otherwise, the user must configure the recipients manually per resources on a “need-to-know” basis following the EDPS Cloud acceptable use policy. Typical recipients are other EDPS staff members and possibly external collaborators.

Special categories of personal data must not be processed in the EDPS cloud, in accordance with the use policy.

The EDPS Cloud administrators and the EDPS Cloud service provider may access data

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

exceptionally for operational support or for upholding the security. This access is logged and monitored.

The European Union's Computer Emergency Response Team (CERT-EU) receives diagnostic data such as internet connectivity data (access logs) that match regularly updated IT security queries for IT security investigations.

Where did we get your personal data?

Users generate personal data through their use of the EDPS Cloud (see section above, in particular activity log).

We process personal data from the European Commission's EU-Login account directory for authentication and access management.

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

The **overall purpose** of the processing is to provide a modern collaborative workspace to EDPS staff. The legal basis for the generic access and use of the EDPS cloud is Article 5(1)(a) ("necessary for the performance of a task carried out in the public interest") of the Regulation.

For the **specific purposes**, please refer to the specific EDPS data protection notices.

How long do we keep your personal data?

The personal data of EDPS staff members are 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.

The overall time limits for which the documents and files are kept in the EDPS Cloud depends 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 records of the operational processes supported by those documents.

For the retention period applicable to EU-login, please refer to the EC record [DPR-EC-03187.1](#) and the [EU-login privacy statement](#).

The retention period of diagnostic data such as internet connectivity data (access logs) for the purpose of IT security investigations is one year.

See also column "Data Retention" in the document "Nextcloud-Database-Tables" that is also annexed to the EDPS Cloud data processing record and published on the [software vendor's website](#).

What are your rights regarding your personal data?

You have the right to request access to your personal data and to relevant information concerning how we use it. You have the right to request rectification of your personal data. You have the right to ask for the erasure of your personal data or to restrict its processing. You have the right to object to the 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.

Please note that, in certain cases, as provided in Article 25 of the Regulation, restrictions of data subjects' rights may apply.

We will consider your request, take a decision and communicate it to you. The time limit for treating your request is one (1) month. This period may be extended by two (2) further months where necessary, taking into account the complexity and the number of the requests. In those cases, the EDPS will inform you of the extension within one (1) month of receipt of your request and will provide reasons for the delay.

You can send your request to the EDPS electronically or by post (see section on contact details below).

Automated decision-making

Your personal data is not subject to automated decision-making.

You have the right to lodge a complaint

If you have any remarks or complaints regarding the way EDPS processes your personal data, we invite you to contact the responsible department or role or the EDPS DPO (see section on contact details on the first page and 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.

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 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.