

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
<i>Processing of personal data in the HERMES-ARES-NOMCOM system</i>		
1.	Last update of this record	18.10.2023
2.	Reference number	78
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: Governance and Internal Compliance Unit <edps-ares@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>
4.	Name and contact details of DPO	dpo@edps.europa.eu
5.	Name and contact details of joint controller (where applicable)	Not applicable
6.	Name and contact details of processor (where applicable)	In accordance with the Service Level Agreement (SLA) signed with the European Commission (EC), the EC acts as data processor for the processing of personal data of EDPS staff in the context of the provision of Ares-NomCcom services and EU-Sign services.



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7.	Short description and purpose of the processing	<p>The HAN (HERMES-ARES-NOMCOM) is a set of IT tools to manage documents and files. It contains Ares, a repository for documents received and produced by the EDPS in the exercise of its tasks related to human resources, budget and finance and administration matters; NomCom, an application to manage the file plan, retention schedules and the file list; and Hermes, a repository to manage current records. It ensures business continuity and accountability in the context of EDPS activities by keeping appropriate documentation.</p> <p>The overall purpose of the processing is to ensure that files and records produced and received in the context of EDPS administrative activities are managed according to applicable legal basis and internal policies and procedures.</p> <p>The specific purposes are to set up the user accounts to enable users to access the system, register documents, to fill in relevant metadata fields at file and document level, to set up workflows, and to sign documents using simple electronic signature or qualified electronic signature, to comply with internal rules and procedures on records and document management.</p>
8.	Description of categories of persons whose data the EDPS processes and list of data categories	<p><u>Categories of persons:</u></p> <ol style="list-style-type: none"> 1) EDPS staff (all persons, officials, contract or other agents being part of the EDPS Secretariat staff) 2) Potentially any individual exchanging information with the EDPS or referenced in documents drafted or received by the EDPS <p>The <u>data categories</u> are:</p> <p>For HAN users</p> <ul style="list-style-type: none"> - EU Login user login for access - First and last name - Administrative entity to which the user is linked - Internal phone number extension



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		<ul style="list-style-type: none"> - Office location - COMREF person ID - Work e-mail address (if enabled for external transmission) - Any other kind of personal data in the free text comment fields and in Ares document attachments - Personal data related to the use of the qualified electronic signature service (EU Sign) <ul style="list-style-type: none"> • Name, Surname • Generated user ID of the requestor • Work e-mail address • Data on the signing certificate for users of the remote signing functionality (defined by the user. It can be, but not limited to, first and last name; date of birth; ID Number; title/role) <p>For external persons</p> <ul style="list-style-type: none"> - First name (optional) - Last name (mandatory) - E-mail address (mandatory when encoding e-mails from or sent to an external natural person using AresLook and when Ares document attachments are sent to an external natural person directly via the system; optional in any other case) - City and/or country where the person is located (optional) - Organisation for which the person is working (optional) - Additional personal data as provided by individuals or third parties (e.g. other institutions), or collected by the EDPS to fulfil its tasks. In particular, different categories of personal data can be found in the content of EDPS documents and files. The full text indexing of documents entered in the system may reveal personal data of all kinds.



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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 files and workflow related activities. Once a staff member leaves the EDPS, the link between user account and EDPS documents and files is interrupted, so that, even though the system can still be accessed (for example, in case the user becomes a staff member of another EUI), there will be no access to EDPS files and documents.</p> <p>The overall time limits, for which the documents and files are kept in the system, as well as the subsequent actions, are set in accordance with the EDPS Retention Schedule.</p> <p>The Retention Schedule lays down the retention period for each type of file, taking into account its administrative usefulness, statutory and legal obligations and its potential historical value.</p> <p>The retention period for each type of file is determined in the Retention Schedule by:</p> <ul style="list-style-type: none"> a) its administrative retention period (ARP): period of time during which the service is required to keep a file depending on its administrative usefulness and the statutory and legal obligations linked to it; b) action to be taken at the end of the ARP (post-ARP action), consisting of one of the following three courses of action: transfer to the archives, sampling and/or selection, elimination; c) where appropriate, action following transfer to the archives: permanent preservation or second review (assessment of the historical value of the files to decide whether they should be permanently preserved or eliminated).
10.	Recipients of the data	<ul style="list-style-type: none"> - Service provider's staff may have access to data on a need to know basis for operational support within the framework of the contractual arrangements concluded (SLA and annexes) - For data processed in the context of archiving in the public interest, when the archiving process is operational, future recipients would be: a) additional potential processors, in the case of an external IT solution catering for the long term preservation of the archives; b) Historical Archives of the European Union in Florence (European University Institute); c) Potentially any



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		<p>individual having access to the archives once they are open to the public according to the thirty years rule established in relevant Regulations on Archives applicable to all EUIs.</p> <ul style="list-style-type: none"> - The European Commission, as processor of EU Sign, in accordance with the SLA signed with the EDPS (the EC record DPR-EC-03186.3 and the EU-Sign privacy statement). - For metadata of external persons and organisations included in Ares as senders or addressees of documents, kept in a common database, all EU institutions, bodies, agencies using Ares. As per internal rules, EDPS staff does not use this feature.
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No.
12.	General description of security measures, where possible.	In accordance with Article 33 of Regulation (EU) 2018/1725, the Commission as, data processor, has adopted and implemented technical, security and organisational measures for the electronic records management system Hermes-Ares-NomCom (HAN) to ensure the security of the personal data processed. Such measures cover system inherent features, and functionalities made available, and apply to data in transit and stored. They include also data logging.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	DPN available in Ares

