

EUROPEAN DATA PROTECTION SUPERVISOR

## EDPS' USE OF THE EC'S SECABC PLATFORM FOR ENABLING SECURE COMMUNICATION VIA ENCRYPTED MESSAGES WITHIN EUIS AND EXCHANGING AND/OR STORING OF ADDRESS BOOK

#### **DATA PROTECTION NOTICE**

The European Commission (EC) DG DIGIT provides technology services to the EDPS, in the form of access to the SECABC IT platform, which enables the European Data Protection Supervisor (EDPS) to securely share the address book data and the secure email certificate's public keys with the participating European Institutions, Bodies and Agencies (EUIBAs). Only authorised users can access the SECABC platform.

The EDPS, the EC-DG DIGIT and the participating EUIBAs, are joint controllers for this processing activity ('joint controllers').

DG DIGIT is responsible for the development, operation, administration, and maintenance of the SECABC platform.

Each joint controller is responsible (where applicable) for processing the address book data and secure email certificates of all participating EUIBAs respectively, which has been made available to them via the SECABC platform.

The EDPS is responsible (where applicable) for processing (managing, storing, etc.) the address book data and secure email certificate's public keys of all participating EUIBAs respectively, which has been made available to them via the SECABC platform.

The European Parliament uploads the relevant data, on behalf of the EDPS, to the SECABC platform and the EDPS decides which data (address book data and/or certificates) to share with the other participating EUIBAs. Then, the participating EUIBAs will download the data to the extent they have been authorised.

## Who is the controller and processor?

The participating EUIBAs are joint controllers.

## **EDPS**

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Technology and Privacy Unit, Digital Transformation Sector, EDPS IT - EDPS-IT@edps.europa.eu

Contact form for enquiries on processing of personal data to be preferably used: <u>https://www.edps.europa.eu/about-edps/contact\_en</u>.

For more information on the EDPS please consult our website: https://edps.europa.eu

## EC

Directorate-General for Informatics Operational controller: Head of Unit DIGIT.B.3 Address: 1049, Brussels, Belgium Email of the operational controller: <u>DIGIT-SECABC@ec.europa.eu</u>

For the EDPS, the **European Parliament DG ITEC** acts as a processor given that the EDPS data are maintained in the Windows Active Directory environment.

# What personal data do we process and who has access to this personal data? Personal data of EDPS staff are processed.

Personal data that are processed by the EC for the provision of the service:

- For the registration of entities (participating EUIBAs): local ID, full name of the EUIBA's representative, given name, gender code, date of birth, email address, telephone number, department, physical de-livery office name, job title, proxy address.
- For generating and managing the email certificates: local ID, email address, distinguished name and public key.

Personal data processed by each participating EUIBA:

• For exchanging or storing the address book and email certificates: name, surname, email address, business phone number, gender code, location, department, Institution.

The recipients of the EDPS Staff personal data are:

- the EC-DG DIGIT, for developing, managing and maintaining SECABC.
- participating EUIBAs with whom EDPS decided to share EDPS' staff personal data.

## Where did we get your personal data?

All the information collected is provided by the EDPS staff and by the EDPS Human Resources and Business Administration Unit. The data are kept and maintained by the European Parliament's DG ITEC in the Windows Active Directory environment.

Each participating EUIBA may obtain the address book and secure certificates information belonging to other participating EUIBAs from those EUIBAs.

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

The purpose of the processing is to synchronize the EDPS address book information, including the email certificate's public keys, with the participating EUIBAs, keeping it always up to date, easily accessible and with reduced complexity, thereby making it easier

and less complex to implement secure communication via encrypted messages between EUIBAs.

We process your personal data under the following legal basis:

Article 5(1)(a) of the Regulation: 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body; '

Processing of personal data for the performance of tasks carried out in the public interest by the Union institutions and bodies includes the processing of personal data necessary for the management and functioning of those institutions and bodies. More specifically, for:

- Registration of entities (participating EUIBAs).
- Generating and managing the email certificates (public keys).
- Exchanging and/or storing the address book.

## How long do we keep your personal data?

The personal data of EDPS staff members are kept in the EDPS address book and in the SECABC platform, maintained by the EDPS, for the duration of the user's contract with the EDPS. Once a staff member leaves the EDPS, the information is removed from the EDPS address book and from the SECABC platform after a period of three months.

Personal data of each participating EUIBA will be stored by the EC for as long as it is a party to the joint controllership agreement.

In case a participating EUIBA decides to withdraw from the joint controllership agreement, that EUIBA shall delete all personal data that has downloaded from the SECABC platform within one month and all other parties will delete all data (that have downloaded) that belong to the departing party.

In case of termination of joint controllership agreement, all EUIBAs, all Parties shall delete all personal data that have downloaded from the SECABC platform within one month. EC (DG DIGIT) will also delete all data from SECABC within one month.

## 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.

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 <u>below</u>).

## 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 <u>below</u>).

You have, in any case, the right to lodge a complaint with the EDPS as data protection supervisory authority: <u>https://edps.europa.eu/data-protection/our-role-</u>

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: <u>https://www.edps.europa.eu/about-edps/contact\_en</u>.

If you wish to contact the EDPS DPO personally, you can send an e-mail to <u>DPO@edps.europa.eu</u> 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: <u>https://edps.europa.eu/about-edps/contact\_en</u>.