

EDPS Record of Processing Activity

Nr.	Item	Description
	<i>Use of EP's service desk ticketing system (ServiceNow) by the EDPS</i>	
1.	Last update of this record	28/01/2025
2.	Reference number	90
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>Delegated controller: EDPS Technology and Privacy Unit, EDPS-IT@edps.europa.eu EDPS Governance and Internal Compliance, G-IC@edps.europa.eu</p> <p>For more information on the EDPS please consult our website: https://edps.europa.eu</p> <p>Contact form for enquiries on processing of personal data to be preferably used: https://www.edps.europa.eu/about-edps/contact_en</p>

Document info

Roles & Contact Details

		<p>The European Parliament (EP) is a separate controller for this processing activity.</p> <p>EP, DG for Innovation and Technological Support (DG ITEC) Directorate for Development and Support, User Support Unit. ITECServiceDesk@europarl.europa.eu.</p> <p>For more information, please refer to the:</p> <ul style="list-style-type: none"> • DPN (public) • record
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)	ServiceNow Nederland B.V. (the Netherlands)
7.	Short description and purpose of the processing	<p>ServiceNow is a cloud-based system, used by the EDPS local IT support teams to manage incidents and requests submitted by individual users, and for monitoring the quality of such services.</p> <p>Personal data are processed to enable the EDPS local IT support teams to provide IT support services for EDPS end users, in the context of the applications that are supported by the EDPS. If any escalation is needed (to the EC, to the EP or to a 3rd party), the escalation will be handled outside of the EP ServiceNow</p>

Roles & Contact Details

Description of processing

		<p>or in ServiceNow but with a different ticket opened by the EP ITEC Service Desk, where it concerns support provided by ITEC.</p> <p>The performance of individuals is not monitored nor measured, however tickets by user may be categorised together to reduce the risk of duplicates or delays.</p> <p>As such, personal data are processed for the purposes of the performance, management and monitoring of the EDPS local IT support teams, via the ServiceNow ticketing system:</p> <ul style="list-style-type: none"> • Administration of request and incident tickets related to IT applications managed by the EDPS (excluding the process of managing IT security incidents); <p>In particular, the purpose of the processing is:</p> <ul style="list-style-type: none"> • To allow all EDPS users to contact easily IT support via a single point of contact • To allow all EDPS users to keep track of their requests • To allow the EDPS local IT support teams to manage IT requests and incidents in a more structured way and extract relevant statistical data in order to optimize and improve the quality of IT support
8.	Description of categories of persons whose personal data is processed and list of data categories	<p><u>Categories of persons</u></p> <p>EDPS staff</p> <p><u>Categories of personal data</u></p> <p>The necessary personal data for EDPS staff to use ServiceNow are:</p>

Description of processing

		<ul style="list-style-type: none"> • data collected and used for the management of the tickets (e.g. ticket recording, follow-up of the ticket) concerning the user's need for IT support (i.e. requests for changes, for configurations or related to problems or incidents management); • data required for the provisions of the requested services (collected via ServiceNow and then used by the teams in charge of providing the requested services). This comprises the user name, first and last name, office number, office telephone number, email address, user ID (basic contact information) and any other information provided by or with the user in order to manage tickets and the related service. In the scope of resolving an incident, it may occur that users are asked to provide further data, e.g. a sample document in case of a file corruption or another means of contact such as private phone number; • data required to access the self-service portal (user credentials collected by the European Parliament's own authentication systems to authorise access to ServiceNow. These are not passed to ServiceNow). <p>There are several types of logs generated in the system:</p> <ul style="list-style-type: none"> • System logs (syslog) and System Events (sysevent): These contain technical data (e.g. server name), IPs, email address and user names; • Audit logs: they are text logs that log which fields are changed, the value of the change and the username of the person that did the change. The personal data processed are any of the fields used for the management of the tickets and/or any of the fields used for the provision of the requested services and/or any of the fields used to access the self-service portal. This does not apply to the special field that has specific personal data. 	Description of processing
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		<p>Access to these personal data is provided to only a restricted pool of authorised people in the EDPS and in the EP. These people are the EDPS local IT support teams and the EP support units in each DG that uses ServiceNow.</p> <p>These individuals (EDPS staff, EP staff and external service providers) abide by statutory, and when required, additional confidentiality agreements.</p>
9.	Time limit for keeping the data	<p>According to the EP data protection notice, <i>Personal data are stored in ServiceNow tickets, which are kept according to the following retention period rules:</i></p> <ul style="list-style-type: none"> • <i>Personal data (which includes data collected and used for the management of the tickets, data required for the provisions of the requested services and data required to access the self-service portal) are kept for a maximum of 5 years from the closing of the ticket. After this period, the entire ticket, including any attachments, is deleted from the database;</i> • <i>The only exception will be the case in which one ticket is connected to another; In this case the retention period for both will be 5 years starting from the closing of the more recent ticket;</i> <p><i>The retention period of 5 years has been determined and justified taking into consideration different elements, as follows:</i></p> <ul style="list-style-type: none"> • <i>The history of previous support requests in the “EP Service Desk” provides essential input when addressing new support requests, in particular when users previously experienced similar issues;</i> • <i>The maximum retention period has been fixed for five (5) years in order to be able to address cases where Members of the European Parliament (at the end of their current mandate) request to retrieve their support requests presented since the beginning of their current mandate;</i>

Retention

		<p><i>Note that the retention period is extended by ServiceNow's default retention period of 28 days for IT security backups needed for ensuring business continuity.</i></p> <ul style="list-style-type: none"> <i>Where private personal data are provided to the support services (such as private phone numbers), these data are stored in a special data field, subject to additional security rules (the field contents are not recorded in audit logs and the field contents are immediately deleted once the ticket is closed). This does not apply to any personal data which may be provided in an attachment to the ticket, e.g., a screenshot (attachments are kept for a maximum of 5 years from the closing of the ticket), and feasible manual or automated solutions for immediately removing this data once the ticket is closed will be investigated;</i> <i>Inactive tickets will be closed within a maximum of 1 year, unless the user re-opens the ticket;</i> <p><i>For the logs generated in the system:</i></p> <ul style="list-style-type: none"> <i>System logs (syslog) are kept for 8 weeks, then deleted.</i> <i>System Events (sysevent) are kept for 1 week, then deleted.</i> <i>System Events (sysevent): These contain technical data (e.g. server name), IPs, email address and user names.</i> <i>Audit logs: are kept as long as the tickets exist and are deleted whenever the related ticket is removed from the system.</i> 	Retention
10.	Recipients of the data	The recipients of the EDPS staff personal data are: the EP support units in each DG that uses ServiceNow.	Recipients

11.	<p>Are there any transfers of personal data to third countries or to international organisations? If so, to which ones and with which safeguards?</p>	<p>Personal data could be transferred outside of the EU/EEA a non-EU country in the context of technical support for the ServiceNow application, that is requested to ServiceNow.</p> <p>Service Now uses the following affiliates in order to support the provision of the service and any professional services: ServiceNow, Inc. (USA), ServiceNow Nederland B.V. (the Netherlands), ServiceNow Australia Pty Ltd (Australia), ServiceNow Software Development India Private Limited (India), ServiceNow UK Ltd. (United Kingdom), ServiceNow Ireland Limited (Ireland) and ServiceNow Japan K.K. (Japan). ServiceNow Nederland B.V. (the Netherlands) will act as a processor while the other affiliates listed above, plus the data centre operators (Equinix/interxion) will act as sub-processors to provide technical assistance.</p> <p>ServiceNow is EU-US Data Privacy Framework certified.</p> <p>Only ServiceNow Australia Pty Ltd (Australia) and ServiceNow Software Development India Private Limited (India) do not benefit from adequacy decisions. Note that transfer to affiliates outside the EU might only occur if the EU support is not able to perform advanced support (reducing the probability to very low). In any case, the EP can refuse access from IT support from India or Australia.</p> <p>The EDPS will not make use of the support provided by ServiceNow affiliates in countries that do not benefit from an adequacy decision.</p>
12.	<p>General description of security measures, where possible.</p>	<p>Access to Service Now is controlled with the EP's Active Directory, where EDPS users are registered.</p>

Transfers

Security



		Relevant “physical and/or IT security” measures applied by the EP.
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 published internally.

Data Protection Notice