

**From:** [REDACTED]  
**Sent:** 17 April 2019 18:51  
**To:** [REDACTED]  
**Cc:** [REDACTED] European Data Protection Supervisor  
**Subject:** RE: Consultation about the efficient printing' system | EDPS case n° 2019-0373  
**Attachments:** Att 1 - 2019.03.29 - Description of the processing - MFDs with authentication process (002).pdf; Att 2 - 2019.04.01 - Description of the processing - MFDs with authentication process.pdf; Att 3 - 2019.04.04 - Notification - MFDs with authentication process.pdf; Att 4 - 2019.04.01 - PS - MFDs with authentication process.pdf; Att 5 - 2019.03.29 - PN - MFDs with authentication process.pdf

Dear [REDACTED],

First of all, we would like to thank you for giving us the opportunity to present the situation on this file during our last meeting.

As regards the informal consultation, please find attached the documents provided during the meeting:

- [Att 1] The description of the processing as part of the Record (first version dated 29/03/2019 with the identification of the data controller);
- [Att 2] The description of the processing as part of the Record (second version dated 01/04/2019 with the identification of the data controller and of the data "controller in practice");
- [Att 3] The notification of the processing used in the current internal procedures;
- [Att 4] The Privacy Statement (PS) that we would like to publish on the intranet;
- [Att 5] The Privacy Notices (PN) with a shorter version for the posters and a longer version for the intranet (such as on intranet pages related to the [Network Printers](#), to the [Efficient printing](#) as well as to the Printing and scanning for [MEPs](#) and [EP Staff](#)).

We have taken note of your remarks during the meeting on the publication of the Privacy Statement on different communication support (i.e. Privacy Statement in the user guide and on the posters, links to the Privacy statement in the emails received after scanning).

In this regard, we have some questions about the posters on the walls close to the printers. We had firstly the idea to include on the posters a Privacy Notice (a short version of the privacy statement, referring to the full Privacy Statement published in the intranet). This element was discussed during the meeting, but you suggested to display instead the whole Privacy Statement on the posters.

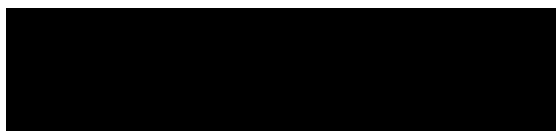
Unfortunately, the outlet of the posters does not allow to include the full text of the Privacy Statement (as presented in the file). At the end of the meeting, we discussed the possibility to present the Privacy Statement in separate posters also close to the printers. However, we wonder if publishing too much information in the same place (instructions on how to use the printers and Privacy Statement) will hinder communication.

Furthermore, having the Privacy Statement published in too many places may increase the risk of incoherence in case of update or modification, as timely managing updates for the physical supports is challenging in an Institution with three headquarters and several buildings in each of them.

Our intention is to provide the data subject with clear, complete and up-to-date information about the processing of his/her personal data. To this end, we would be grateful if you could provide recommendations on how to combine the need for easily accessible and direct information to the data subject and efficient updates on physical supports.

Many thanks in advance for your answer,

Yours sincerely,



European Parliament  
Directorate-General for Innovation and Technological Support  
Directorate for Resources

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 16 April 2019 11:19  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
European Data Protection Supervisor <[EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)>  
**Subject:** Consultation about the efficient printing' system | EDPS case n° 2019-0373

Dear [REDACTED],

Following our meeting of 4 April 2019, on behalf of the EDPS I acknowledge receipt of your request for informal consultation on the European Parliament's efficient printing system.

At this regard, could I kindly ask you to send us the digital version of the documents that you have provided us during the meeting. Please do not hesitate in sending us any other documents that you find relevant for the analysis of this matter.

For further correspondence, please note that the case number for this matter is 2019-0373. Please include the EDPS functional mailbox ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) in all your communications with the case officer.

Yours sincerely,



Postal address: Rue Wiertz 60, B-1047 Brussels  
Office address: Rue Montoyer 30, B-1000 Brussels  
[@EU EDPS](mailto:@EU_EDPS) [www.edps.europa.eu](http://www.edps.europa.eu)

This email (and any attachment) may contain information that is internal or confidential. Unauthorised access, use or other processing is not permitted. If you are not the intended recipient please inform the sender by reply and then delete all copies. Emails are not secure as they can be intercepted, amended, and infected with viruses. The EDPS therefore cannot guarantee the security of correspondence by email.

## Data Protection - DG ITEC Record of processing activity

### Description of personal data processing

**Purpose:** This file presents a detailed description of a personal data processing. Such description has to be included in the Record file in the context of the Accountability principle laid down in Article 4(2) of Regulation (EU) 2018/1725.

By signing this document, the Data Controller of the processing declares the accuracy of the statements and undertakes to update any change affecting this information.

Please refer to Article 31 of Regulation (EU) 2018/1725 presenting the requirements on Records of processing activities.

1. IDENTIFICATION OF THE DATA CONTROLLER OR ANY SYSTEM	
<i>The data controller is the unit or other organisational entity which, alone or jointly with others, determines the purposes and means of the processing of personal data.</i>	
First name	██████
Last name	██████
E-mail	████████████████████.██████
Function	Head of Unit
Administrative Address: Building and room	██████████
Tel.	██████████
Place of work	Luxembourg
<i>The joint controller is the unit or other organisational entity which, jointly with other data controller(s), determines the purposes and means of the processing of personal data.</i>	
Name and contact details of joint controller (where applicable)	
<i>Personal data filing system means any structured set of personal data accessible according to specific criteria</i>	
Name of filing system	Multifunctional devices for printing, copying and scanning with authentication process
Instance(s) responsible for processing	PRINTING Unit (under Directorate for Publishing & Distribution)
Building and room	██████████
Place of work	Luxembourg

## 2. PURPOSE AND LEGAL BASIS OF PROCESSING

*Personal data must be processed only for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes.*

<p>2.1 Indicate the purpose of this processing of personal data (Please, described the procedure linked to this operation):</p>	<p>The multifunctional devices (MFDs) use personal data to provide more efficiency, more security, and modern new features. It gives the possibility to send jobs for printing (files to print) from PCs or mobile devices.</p> <p>These devices require user authentication:                      - The first time: necessity to register the EP badge (ID and password from the EP LDAP required),                      - The next times: necessity to scan the EP badge.</p> <p>After scanning their EP badge on the MFDs, the data subjects (users) have access to different parameters where they can choose to modify, print or delete files (previously sent to the printer) or to scan or copy files.</p> <p>Anonymised data will be used for statistical purposes in order to have a better overview of the paper and toner consumption.</p>	
<p>2.2 Indicate any internal decision or initiative for this processing operation</p>	<p>These ePrinters are installed to meet the objectives of the Parliamentary Project [ITEC P12] "Efficient printing" presented in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2017-2019.</p>	
<p>2.3 Does this processing allow linkages between data processed for different purposes? (Compatible purposes)</p>	<p>YES: <input type="checkbox"/> NO: <input checked="" type="checkbox"/></p>	<p>If YES, please specify:</p>
<p>2.4 Lawfulness:</p>	<p><input checked="" type="checkbox"/> Article 5 (1.a) - Task carried out in the public interest or in the exercise of official authority vested in the Union institution or body  <i>Remark: It shall be laid down in Union Law</i></p> <p><input type="checkbox"/> Article 5 (1.b) - Legal obligation to which the data controller is subject  <i>Remark: It shall be laid down in Union Law</i></p> <p><input type="checkbox"/> Article 5 (1.c) - Performance of contract (specific choice of data subjects)</p> <p><input type="checkbox"/> Article 5 (1.d) - Data subjects' consents - freely given, specific, informed and unambiguous (clear affirmative action from data subject)</p> <p><input type="checkbox"/> Article 5 (1.e) - Protect the vital interest</p> <p><input type="checkbox"/> Any other basis, please specify:</p>	

## 3. CATEGORIES OF DATA

*Personal data' means any information on an identified or identifiable natural person. Indicate all the categories of data contained in the file.*

<p>3.1 Categories of personal data</p>	<p>Civil status data and identification</p>	<p><input checked="" type="checkbox"/> First name and last name  <input type="checkbox"/> Photography  <input type="checkbox"/> Citizenship(s)  <input type="checkbox"/> Identification card number  <input type="checkbox"/> Sex  <input type="checkbox"/> Date and place of birth  <input type="checkbox"/> Other (please specify below in the "Other" part)</p>
	<p>Data related to the professional sphere</p>	<p><input type="checkbox"/> Data about recruitment  <input type="checkbox"/> Office number  <input type="checkbox"/> Phone number</p>

		<input checked="" type="checkbox"/> Directorate, Unit, Service, Department <input checked="" type="checkbox"/> Email address such as <a href="mailto:name.surname@xxx.yyy">name.surname@xxx.yyy</a> <input type="checkbox"/> Communication <input type="checkbox"/> Employee number <input type="checkbox"/> Job title (especially if it is unique) <input type="checkbox"/> Training, skills, degree and certification <input type="checkbox"/> Employee's work <input type="checkbox"/> Ability, efficiency, conduct <input type="checkbox"/> Employment contract and salary <input type="checkbox"/> Leave and absence <input type="checkbox"/> Missions / journeys <input type="checkbox"/> Career <input type="checkbox"/> Suspected offences, offences, criminal convictions or security measures <input type="checkbox"/> Other (please specify below in the "Other" part)
	Data related to the private sphere	<input type="checkbox"/> Home address (street, zip, postal code, city) <input type="checkbox"/> Phone number <input type="checkbox"/> Email address such as <a href="mailto:name.surname@xxx.yyy">name.surname@xxx.yyy</a> <input type="checkbox"/> Bank account / credit card number <input type="checkbox"/> Habits of life <input type="checkbox"/> Family situation or concerning the data subject's family <input type="checkbox"/> Social security and pensions <input type="checkbox"/> Income, financial, fiscal situation <input type="checkbox"/> Suspected offences, offences, criminal convictions or security measures <input type="checkbox"/> Other (please specify below in the "Other" part)
	Technical data	<input checked="" type="checkbox"/> Identifier (e.g. login) <input checked="" type="checkbox"/> Username <input type="checkbox"/> Location data <input type="checkbox"/> Internet Protocol (IP) address <input type="checkbox"/> MAC address <input type="checkbox"/> Cookie ID <input type="checkbox"/> Other (please specify below in the "Other" part)
	Other (e.g. other physical characteristics) - Please specify:	Badge number, technical job name of the job (scan, print, copy), date of the job, personal data included in the printing, copying and scanning data.
3.2 Special categories of personal data	<input type="checkbox"/> Revealing racial or ethnic origin <input type="checkbox"/> Revealing political opinions <input type="checkbox"/> Revealing religious or philosophical beliefs <input type="checkbox"/> Revealing trade union membership <input type="checkbox"/> Processing of genetic data <input type="checkbox"/> Processing of biometric data for the purpose of uniquely identifying a natural person <input type="checkbox"/> Processing of data concerning health <input type="checkbox"/> Processing of data concerning a natural person's sex life or sexual orientation	
3.3 Please list the personal data processed	First name, last name, Unit, Directorate, email, unit, badge number, Windows user ID, password, username, technical job name (print, copy, scan job), date of the job and personal data included in the printing, copying and scanning data.	

4. DATA PROCESSING		
<i>Data processing' means any operation carried out on personal data, whether or not by automated means.</i>		
4.1 Collection of data	<input checked="" type="checkbox"/> Collection from the data subject (direct) - please specify:	During the authentication process, the user gives his/her credentials and badge number (first authentication) then only his/her badge number (next authentications). The badge number is given by just scanning the badge on the dedicated zone of the device. Then the data subject has the possibility to insert, modify and delete a file or a configuration.
	<input checked="" type="checkbox"/> Other source of collection (indirect) - please specify	Personal data retrieved from the Active directory. All information is imported via several LDAP connectors to the Active directory.
4.2 Processing of data	<input checked="" type="checkbox"/> Processing automated wholly or in part <input type="checkbox"/> Non-automated processing of data intended to form part of a filing system <input type="checkbox"/> Manual processing of a structured set of data accessible according to given criteria	
4.3 Storage of data	4.3.1 Indicate the period of storage and its justification:	<p><b>On the current archives:</b></p> <p>- <b>For the printing</b>, personal data are kept up in encrypted form to 96 hours since the creation of the printing jobs (when the files are sent to print). During this period, the data subjects have the possibility on the multifunctional devices:</p> <ul style="list-style-type: none"> <li>To delete the files to print (in this case personal data are automatically deleted).</li> <li>To print the files (in this case personal data are moved in the "Printed Jobs" tab and deleted at the end of the 96 hours).</li> <li>To print and delete the files via the feature "Print + Delete" available in the "Options" window (in this case personal data are automatically deleted).</li> </ul> <p>- <b>For the copying</b>, personal data are kept in encrypted form on the multifunctional devices during the time of the copying process.</p> <p>- <b>For the scanning</b>, personal data are kept in encrypted form on the multifunctional devices during the time of the scanning process. Personal data are then transferred to the scan destinations chosen by the data subjects. The retention period for these transferred personal data are the ones established for each system of destination.</p> <p><b>On the intermediate archives:</b></p> <p>- <b>Encrypted records</b> in databases (stored on European Parliament servers) are generated during the processing operations. Personal data will be retained for a maximum of 18 months from the moment they are collected.</p> <p>In case of investigation, personal data may be kept for a longer time necessary to conduct the investigation.</p>
	4.3.2 Is any further processing for historical, statistical or scientific purposes envisaged?	YES: <input checked="" type="checkbox"/> NO: <input type="checkbox"/>
	Indicate the form of storage used (anonymous, encrypted, other)	If it is required to retain the data after this period for statistics/analysis purposes, it will be anonymised.
	4.3.3 Indicate the date or period of the beginning of the processing operations:	Autumn 2018

	4.3.4 Indicate the date or period of the ending of the processing operations:	Not foreseen
4.4 File location	<input type="checkbox"/> Standalone PC <input checked="" type="checkbox"/> Parliament network --> If the filing system is available on a network, please indicate the location of the server: // Data center (OPERATIONS)  <input type="checkbox"/> Interinstitutional network (indicate the institution(s) involved) <input type="checkbox"/> Internet http:// <input type="checkbox"/> Intranet http:// <input type="checkbox"/> Other:	

## 5. RECIPIENTS & DATA TRANSFER

5.1 Recipients or categories of recipients to whom data are or will be disclosed (physical or legal persons, administration, companies, staff under the controller or another service within EP, etc.):	Personal data are stored exclusively with restricted access on internal European Parliament servers. These personal data are accessible to the application owner (PRINTING Unit) and to a limited number of back-office staff members (OPERATIONS Unit).		
If the data controller envisages transferring (or has already transferred*) personal data, please answer the questions in this section. * The Regulation (EU) 2018/1725 came into force on the 11th of December 2018. This record presents the characteristics of processing operations processed since the coming into force of this Regulation (since the 11/12/2018). The previous period is not considered here.		Specify (if necessary) the rows below:	
5.2 Are there transfers foreseen (or already made) within or between EU institutions or bodies?  YES: <input type="checkbox"/> NO: <input checked="" type="checkbox"/>	5.2.1 [Will/Have] the data [be/been] transferred following a request from the recipient?	N/A	
	5.2.2 [Will/Has] the data controller [have the possibility to verify/verified] the competence of the recipient and [to make/made] a provisional evaluation of the need for the transfer of the data?	N/A	
	5.2.3 [Will/Has] the recipient [be/been] informed of his obligations in respect of this transfer?	N/A	
5.3 Are there transfers foreseen (or already made) to recipients other than the EU institutions and bodies (e.g. national administrations, private sector)?  YES: <input type="checkbox"/> NO: <input checked="" type="checkbox"/>	5.3.1 Has the recipient established that the data are necessary?	N/A	
	5.3.2 Has the recipient established the need for their transfer?	N/A	
5.4 Are there transfers foreseen (or already made) to recipients outside the EU	Please specify the legal basis, the nature of the data that [may be/were] transmitted and their recipient:		N/A

<p>(e.g. third countries or international organisations)?</p> <p>YES: <input type="checkbox"/> NO: <input checked="" type="checkbox"/></p>	<p>5.4.1 Has the person responsible for the transfer established that an adequate level of protection is ensured in the country of the recipient?</p>	<p><input type="checkbox"/> Adequacy decision by the EC</p> <p><input type="checkbox"/> International agreement</p> <p><input type="checkbox"/> Appropriate safeguards <i>(e.g. standard data protection clauses adopted by the EC or the EDPS; contractual clauses or provisions authorised by EDPS)</i></p> <p><input type="checkbox"/> Derogations for specific situations <i>(e.g. protect vital interests; important reasons of public interest; establishment, exercise or defence of legal claims)</i></p>
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## 6. SECURITY

*The data controller must implement the appropriate technical and organisational measures to ensure an appropriate security level with a view to the prevention of any unauthorised distribution or access, any accidental or illicit destruction, any accidental loss or deterioration, as well as any other form of illicit processing. Give a general description allowing a preliminary evaluation of the adequacy of the measures taken to ensure the security of processing*

<p>6.1 Physical security (access to computer systems, quality of the file supports, public access or restricted access to locations, storage, transport of equipment, etc.)</p>	<p>The new devices require user a physical authentication</p> <p>When data subject (user) send files to print (job for printing) from a device (PC or mobile device), he/she can only collect his/her files after authentication. Authentication process:</p> <ul style="list-style-type: none"> <li>- First authentication: the user gives his/her credentials and badge number (by scanning it).</li> <li>- Next authentications: the user gives only his/her badge number (by scanning it).</li> </ul> <p>Servers storing personal data have a physical access strictly limited.</p> <p>HDD Erase function: The HDD Data Erase will automatically overwrite and erase image data immediately after the job is completed; therefore, no trace of the data remains on the hard disk. It will perform an overwrite up to 3 times (DoD 5220.22M 3 pass) with random data for maximum security protection.</p>
<p>6.2 IT system(s) security (coding control, undue removal or transmission of data, passwords, encrypted directories, backup, audit trails for data processing and communication, etc.)</p>	<p>The HDD Data Encryption uses AES256-bit length encryption keys. This ensures that the data stored on the hard disk is protected against leakage of confidential information by theft of the hard disk.</p> <p>Data are encrypted for the printing, scanning and copying.</p> <p>Print server Spool file encryption protect files spooled to await on servers.</p> <p>Encrypted Secure Print protect print jobs from being output at the device unattended.</p>
<p>6.3 Staff security (restricted access codes, conditions of subcontracting, etc.)</p>	<p>Concerning the accounting data in database (Statistics): accounting and reporting information are only available for the "Admin" ACL (Access Control List) group.</p>



7. DATA SUBJECTS		
<i>The persons to be protected are identified or identifiable natural persons whose personal data are processed by the European Parliament in any context whatsoever.</i>		
7.1 Category (or categories) of data subjects	<input checked="" type="checkbox"/> Officials <input checked="" type="checkbox"/> Other internal staff (e.g. Trainees, Temporary agents) <input checked="" type="checkbox"/> Contract agents <input checked="" type="checkbox"/> MEPs <input checked="" type="checkbox"/> APAs (Parliamentary Assistant) <input type="checkbox"/> European citizens <input type="checkbox"/> Visitor of the European Parliament <input type="checkbox"/> Other, please specify:	
7.2 Indicate the measures taken or envisaged to inform the data subject of the identity of the data controller, of any communication of data concerning him or her, and of his or her rights:	There are two communication tools to inform the data subject: - Privacy Notice (on posters placed next to the printers and included in relevant intranet pages and emails of communication) notifying the data subjects of the processing of personal data and inviting them to see the Privacy Statement for further information on the processing. - Privacy Statement (published on a dedicated intranet page) informing data subjects of all mandatory elements mentioned in Article 15 and 16 of Regulation (EU) 2018/1725.	
7.3 Have any natural or legal persons employed by or under contract to the European Parliament received any instructions about confidentiality in processing personal data?	YES: <input checked="" type="checkbox"/> NO: <input type="checkbox"/>	
7.4 Please explain how data subjects may exercise their rights (rights of access, of rectification, of blocking, of erasure and to object):	By sending an email to <a href="mailto:efficient_printing@ep.europa.eu">efficient_printing@ep.europa.eu</a> . Their requests will be analysed and processed. Additional features have been requested (to the solutions' provider - Canon) in order to be able to reply to data subjects' requests.	
7.5 Processor	Is the processing operation carried out by a processor?	YES: <input type="checkbox"/> NO: <input checked="" type="checkbox"/>
	If "YES": Has a data protection clause been added in the contract?	N/A

8. FURTHER INFORMATION	
<i>Give any information you consider relevant and indicate the heading it refers to:</i>	

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**The data controller declares the accuracy of the above statements and undertakes to update any change affecting this information.**

Signature of the data controller:

## Data Protection - DG ITEC Record of processing activity

### Description of personal data processing

**Purpose:** This file presents a detailed description of a personal data processing. Such description has to be included in the Record file in the context of the Accountability principle laid down in Article 4(2) of Regulation (EU) 2018/1725.

By signing this document, the "Data Controller in practice" of the processing declares the accuracy of the statements and undertakes to update any change affecting this information.

Please refer to Article 31 of Regulation (EU) 2018/1725 presenting the requirements on Records of processing activities.

1. GENERAL INFORMATION	
Reference of the Record	DG-ITEC/C/1
Creation date of the Record	10/01/2019
Last updated of the Record	01/04/2019
Language of the Record	English
Registration status of the Record	Draft
Name of the personal data processing (preferably corresponding to a business process)	Multifunctional devices for printing, copying and scanning with authentication process
Short description of the context of the processing	These ePrinters are installed to meet the objectives of the Parliamentary Project [ITEC P12] "Efficient printing" presented in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2017-2019. It provides support for the employees to execute basic/necessary tasks in the context of their work relationship.
<p><b>Data Controller:</b>  <i>Union institution or body or the directorate-general or any other organisational entity which determines the purposes and means of the processing of personal data.</i>            =&gt; MAKE DECISIONS ON THE PROCESSING            =&gt; ACCOUNTABLE [Answerable for actions, decisions and performance]</p>	
Name and contact details	European Parliament 60 rue Wiertz / Wiertzstraat 60 B-1047 - Bruxelles/Brussels Belgium

<p><b>Joint Controller(s):</b>  <i>Where two or more data controllers jointly determine the purposes and means of processing, they shall be joint controllers. They determine in a transparent manner their respective responsibilities for compliance with their data protection obligations by means of an arrangement between them (unless determined by Union or Member State law).</i>                      =&gt; MAKE DECISIONS ON THE PROCESSING                      =&gt; SHARED ACCOUNTABILITY [Answerable for actions, decisions and performance]</p>	
<p>Per Joint Controller:                      - Name and contact details                      - Roles and responsibilities</p>	
<p><b>Data "Controller in practice":</b>  <i>Responsible of the processing on behalf of the data controller (Directorate-General / Directorate / Unit / Business Owner) which determines the purposes and means of the processing of personal data.</i>                      =&gt; MAKE DECISIONS ON THE PROCESSING                      =&gt; RESPONSIBLE [Obligation to act and take decisions to achieve required outcome]</p>	
First name (internal use)	██████
Last Name (internal use)	██████
Function	Head of Unit - PRINTING Unit (under Directorate for Publishing & Distribution)
Administrative Address: Building and room (internal use)	██████████
E-mail (internal use)	██
Tel. (internal use)	██████████
Functional mailbox (to be used by the data subjects)	<a href="mailto:efficient_printing@ep.europa.eu">efficient_printing@ep.europa.eu</a>
<p><b>Processor:</b>  <i>Natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.</i>                      =&gt; FOLLOW DECISIONS AND INSTRUCTIONS OF THE DATA CONTROLLER (IN PRACTICE)</p>	
<p>Per Processor:                      - Name and contact details                      - Contract reference (if applicable)                      - Roles and responsibilities</p>	

<p><b>2. PURPOSE AND LEGAL BASIS OF PROCESSING</b></p>	
<p><i>Personal data must be processed only for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes.</i></p>	
<p>2.1 Indicate the purpose of this processing of personal data (Please, described the procedure linked to this operation):</p>	<p>The multifunctional devices (MFDs) use personal data to provide more efficiency, more security, and modern new features. It gives the possibility to send jobs for printing (files to print) from PCs or mobile devices.</p> <p>These devices require user authentication:</p> <ul style="list-style-type: none"> <li>- The first time: necessity to register the EP badge (ID and password from the EP LDAP required),</li> <li>- The next times: necessity to scan the EP badge.</li> </ul>

	<p>After scanning their EP badge on the MFDs, the data subjects (users) have access to different parameters where they can choose to modify, print or delete files (previously sent to the printer) or to scan or copy files.</p> <p>Anonymised data will be used for statistical purposes in order to have a better overview of the paper and toner consumption.</p>	
2.2 Indicate any internal decision or initiative for this processing operation	<p>These ePrinters are installed to meet the objectives of the Parliamentary Project [ITEC P12] "Efficient printing" presented in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2017-2019.</p>	
2.3 Does this processing allow linkages between data processed for different purposes? (Compatible purposes)	<p>YES: <input type="checkbox"/> NO: <input checked="" type="checkbox"/></p>	<p>If YES, please specify:</p>
2.4 Lawfulness:	<p><input checked="" type="checkbox"/> Article 5 (1.a) - Task carried out in the public interest or in the exercise of official authority vested in the Union institution or body <i>Remark: It shall be laid down in Union Law</i></p>	
	<p><input type="checkbox"/> Article 5 (1.b) - Legal obligation to which the Data Controller is subject <i>Remark: It shall be laid down in Union Law</i></p>	
	<p><input type="checkbox"/> Article 5 (1.c) - Performance of contract (specific choice of data subjects)</p>	
	<p><input type="checkbox"/> Article 5 (1.d) - Data subjects' consents - freely given, specific, informed and unambiguous (clear affirmative action from data subject)</p>	
	<p><input type="checkbox"/> Article 5 (1.e) - Protect the vital interest</p>	
	<p><input type="checkbox"/> Any other basis, please specify:</p>	

3. CATEGORIES OF DATA		
<p><i>Personal data' means any information on an identified or identifiable natural person. Indicate all the categories of data contained in the file.</i></p>		
3.1 Categories of personal data	Civil status data and identification	<p><input checked="" type="checkbox"/> First name and last name</p> <p><input type="checkbox"/> Photography</p> <p><input type="checkbox"/> Citizenship(s)</p> <p><input type="checkbox"/> Identification card number</p> <p><input type="checkbox"/> Sex</p> <p><input type="checkbox"/> Date and place of birth</p> <p><input type="checkbox"/> Other (please specify below in the "Other" part)</p>
	Data related to the professional sphere	<p><input type="checkbox"/> Data about recruitment</p> <p><input type="checkbox"/> Office number</p> <p><input type="checkbox"/> Phone number</p> <p><input checked="" type="checkbox"/> Directorate, Unit, Service, Department</p> <p><input checked="" type="checkbox"/> Email address such as <a href="mailto:name.surname@xxx.yyy">name.surname@xxx.yyy</a></p> <p><input type="checkbox"/> Communication</p> <p><input type="checkbox"/> Employee number</p> <p><input type="checkbox"/> Job title (especially if it is unique)</p> <p><input type="checkbox"/> Training, skills, degree and certification</p> <p><input type="checkbox"/> Employee's work</p> <p><input type="checkbox"/> Ability, efficiency, conduct</p> <p><input type="checkbox"/> Employment contract and salary</p> <p><input type="checkbox"/> Leave and absence</p> <p><input type="checkbox"/> Missions / journeys</p> <p><input type="checkbox"/> Career</p>

		<input type="checkbox"/> Suspected offences, offences, criminal convictions or security measures <input type="checkbox"/> Other (please specify below in the "Other" part)
	Data related to the private sphere	<input type="checkbox"/> Home address (street, zip, postal code, city) <input type="checkbox"/> Phone number <input type="checkbox"/> Email address such as <a href="mailto:name.surname@xxx.yyy">name.surname@xxx.yyy</a> <input type="checkbox"/> Bank account / credit card number <input type="checkbox"/> Habits of life <input type="checkbox"/> Family situation or concerning the data subject's family <input type="checkbox"/> Social security and pensions <input type="checkbox"/> Income, financial, fiscal situation <input type="checkbox"/> Suspected offences, offences, criminal convictions or security measures <input type="checkbox"/> Other (please specify below in the "Other" part)
	Technical data	<input checked="" type="checkbox"/> Identifier (e.g. login) <input checked="" type="checkbox"/> Username <input type="checkbox"/> Location data <input type="checkbox"/> Internet Protocol (IP) address <input type="checkbox"/> MAC address <input type="checkbox"/> Cookie ID <input type="checkbox"/> Other (please specify below in the "Other" part)
	Other (e.g. other physical characteristics) - Please specify:	Badge number, technical job name of the job (scan, print, copy), date of the job, personal data included in the printing, copying and scanning data.
3.2 Special categories of personal data	<input type="checkbox"/> Revealing racial or ethnic origin <input type="checkbox"/> Revealing political opinions <input type="checkbox"/> Revealing religious or philosophical beliefs <input type="checkbox"/> Revealing trade union membership <input type="checkbox"/> Processing of genetic data <input type="checkbox"/> Processing of biometric data for the purpose of uniquely identifying a natural person <input type="checkbox"/> Processing of data concerning health <input type="checkbox"/> Processing of data concerning a natural person's sex life or sexual orientation	
3.3 Please list the personal data processed	First name, last name, Unit, Directorate, email, unit, badge number, Windows user ID, password, username, technical job name (print, copy, scan job), date of the job and personal data included in the printing, copying and scanning data.	

4. DATA PROCESSING		
<i>Data processing' means any operation carried out on personal data, whether or not by automated means.</i>		
4.1 Collection of data	<input checked="" type="checkbox"/> Collection from the data subject (direct) - please specify:	During the authentication process, the user gives his/her credentials and badge number (first authentication) then only his/her badge number (next authentications). The badge number is given by just scanning the badge on the dedicated zone of the device. Then the data subject has the possibility to insert, modify and delete a file or a configuration.
	<input checked="" type="checkbox"/> Other source of collection (indirect) - please specify	Personal data retrieved from the Active directory. All information is imported via several LDAP connectors to the Active directory.

4.2 Processing of data	<input checked="" type="checkbox"/> Processing automated wholly or in part <input type="checkbox"/> Non-automated processing of data intended to form part of a filing system <input type="checkbox"/> Manual processing of a structured set of data accessible according to given criteria	
4.3 Storage of data	<p>4.3.1 Indicate the period of storage and its justification:</p>	<p><b>On the current archives:</b></p> <p>- <b>For the printing</b>, personal data are kept up in encrypted form to 96 hours since the creation of the printing jobs (when the files are sent to print). During this period, the data subjects have the possibility on the multifunctional devices:</p> <ul style="list-style-type: none"> <li>• To delete the files to print (in this case personal data are automatically deleted).</li> <li>• To print the files (in this case personal data are moved in the "Printed Jobs" tab and deleted at the end of the 96 hours).</li> <li>• To print and delete the files via the feature "Print + Delete" available in the "Options" window (in this case personal data are automatically deleted).</li> </ul> <p>- <b>For the copying</b>, personal data are kept in encrypted form on the multifunctional devices during the time of the copying process.</p> <p>- <b>For the scanning</b>, personal data are kept in encrypted form on the multifunctional devices during the time of the scanning process. Personal data are then transferred to the scan destinations chosen by the data subjects. The retention period for these transferred personal data are the ones established for each system of destination.</p> <p><b>On the intermediate archives:</b></p> <p>- <b>Encrypted records</b> in databases (stored on European Parliament servers) are generated during the processing operations. Personal data will be retained for a maximum of 18 months from the moment they are collected.</p> <p>In case of investigation, personal data may be kept for a longer time necessary to conduct the investigation.</p>
	4.3.2 Is any further processing for historical, statistical or scientific purposes envisaged?	YES: <input checked="" type="checkbox"/> NO: <input type="checkbox"/>
	Indicate the form of storage used (anonymous, encrypted, other)	If it is required to retain the data after this period for statistics/analysis purposes, it will be anonymised.
	4.3.3 Indicate the date or period of the beginning of the processing operations:	Autumn 2018
	4.3.4 Indicate the date or period of the ending of the processing operations:	Not foreseen
4.4 File location	<input type="checkbox"/> Standalone PC <input checked="" type="checkbox"/> Parliament network --> If the filing system is available on a network, please indicate the location of the server: // Data center (OPERATIONS)  <input type="checkbox"/> Interinstitutional network (indicate the institution(s) involved) <input type="checkbox"/> Internet http:// <input type="checkbox"/> Intranet http:// <input type="checkbox"/> Other:	

5. RECIPIENTS & DATA TRANSFER			
5.1 Recipients or categories of recipients to whom data are or will be disclosed <i>(physical or legal persons, administration, companies, staff under the controller or another service within EP, etc.):</i>	Personal data are stored exclusively with restricted access on internal European Parliament servers. These personal data are accessible to the application owner (PRINTING Unit) and to a limited number of back-office staff members (OPERATIONS Unit).		
<i>If the Data Controller (in practice) envisages transferring (or has already transferred*) personal data, please answer the questions in this section.</i> <i>* The Regulation (EU) 2018/1725 came into force on the 11th of December 2018. This record presents the characteristics of processing operations processed since the coming into force of this Regulation (since the 11/12/2018). The previous period is not considered here.</i>			Specify (if necessary) the rows below:
5.2 Are there transfers foreseen (or already made) within or between EU institutions or bodies?  YES: <input type="checkbox"/> NO: <input checked="" type="checkbox"/>	5.2.1 [Will/Have] the data [be/been] transferred following a request from the recipient?	N/A	
	5.2.2 [Will/Has] the Data Controller (in practice) [have the possibility to verify/verified] the competence of the recipient and [to make/made] a provisional evaluation of the need for the transfer of the data?	N/A	
	5.2.3 [Will/Has] the recipient [be/been] informed of his obligations in respect of this transfer?	N/A	
5.3 Are there transfers foreseen (or already made) to recipients other than the EU institutions and bodies (e.g. national administrations, private sector)?  YES: <input type="checkbox"/> NO: <input checked="" type="checkbox"/>	5.3.1 Has the recipient established that the data are necessary?	N/A	
	5.3.2 Has the recipient established the need for their transfer?	N/A	
5.4 Are there transfers foreseen (or already made) to recipients outside the EU (e.g. third countries or international organisations)?  YES: <input type="checkbox"/> NO: <input checked="" type="checkbox"/>	Please specify the legal basis, the nature of the data that [may be/were] transmitted and their recipient:	N/A	
	5.4.1 Has the person responsible for the transfer established that an adequate level of protection is ensured in the country of the recipient?	<input type="checkbox"/> Adequacy decision by the EC <input type="checkbox"/> International agreement <input type="checkbox"/> Appropriate safeguards <i>(e.g. standard data protection clauses adopted by the EC or the EDPS; contractual clauses or provisions authorised by EDPS)</i> <input type="checkbox"/> Derogations for specific situations <i>(e.g. protect vital interests; important reasons of public interest; establishment, exercise or defence of legal claims)</i>	

<b>6. SECURITY</b>	
<i>The Data Controller (in practice) must implement the appropriate technical and organisational measures to ensure an appropriate security level with a view to the prevention of any unauthorised distribution or access, any accidental or illicit destruction, any accidental loss or deterioration, as well as any other form of illicit processing. Give a general description allowing a preliminary evaluation of the adequacy of the measures taken to ensure the security of processing</i>	
6.1 Physical security (access to computer systems, quality of the file supports, public access or restricted access to locations, storage, transport of equipment, etc.)	<p>The new devices require user a physical authentication</p> <p>When data subject (user) send files to print (job for printing) from a device (PC or mobile device), he/she can only collect his/her files after authentication. Authentication process:</p> <ul style="list-style-type: none"> <li>- First authentication: the user gives his/her credentials and badge number (by scanning it).</li> <li>- Next authentications: the user gives only his/her badge number (by scanning it).</li> </ul> <p>Servers storing personal data have a physical access strictly limited.</p> <p>HDD Erase function: The HDD Data Erase will automatically overwrite and erase image data immediately after the job is completed; therefore, no trace of the data remains on the hard disk. It will perform an overwrite up to 3 times (DoD 5220.22M 3 pass) with random data for maximum security protection.</p>
6.2 IT system(s) security (coding control, undue removal or transmission of data, passwords, encrypted directories, backup, audit trails for data processing and communication, etc.)	<p>The HDD Data Encryption uses AES256-bit length encryption keys. This ensures that the data stored on the hard disk is protected against leakage of confidential information by theft of the hard disk.</p> <p>Data are encrypted for the printing, scanning and copying.</p> <p>Print server Spool file encryption protect files spooled to await on servers.</p> <p>Encrypted Secure Print protect print jobs from being output at the device unattended.</p>
6.3 Staff security (restricted access codes, conditions of subcontracting, etc.)	<p>Concerning the accounting data in database (Statistics): accounting and reporting information are only available for the "Admin" ACL (Access Control List) group.</p>

<b>7. DATA SUBJECTS</b>	
<i>The persons to be protected are identified or identifiable natural persons whose personal data are processed by the European Parliament in any context whatsoever.</i>	
7.1 Category (or categories) of data subjects	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Officials</li> <li><input checked="" type="checkbox"/> Other internal staff (e.g. Trainees, Temporary agents)</li> <li><input checked="" type="checkbox"/> Contract agents</li> <li><input checked="" type="checkbox"/> MEPs</li> <li><input checked="" type="checkbox"/> APAs (Parliamentary Assistant)</li> <li><input type="checkbox"/> European citizens</li> <li><input type="checkbox"/> Visitor of the European Parliament</li> <li><input type="checkbox"/> Other, please specify:</li> </ul>
7.2 Indicate the measures taken or envisaged to inform the data subject of the identity of the Data Controller (in	<p>There are two communication tools to inform the data subject:</p> <ul style="list-style-type: none"> <li>- Privacy Notice (on posters placed next to the printers and included in relevant intranet pages and emails of communication) notifying the data subjects of the</li> </ul>



practice), of any communication of data concerning him or her, and of his or her rights:	processing of personal data and inviting them to see the Privacy Statement for further information on the processing. - Privacy Statement (published on a dedicated intranet page) informing data subjects of all mandatory elements mentioned in Article 15 and 16 of Regulation (EU) 2018/1725.	
7.3 Have any natural or legal persons employed by or under contract to the European Parliament received any instructions about confidentiality in processing personal data?	YES: <input checked="" type="checkbox"/> NO: <input type="checkbox"/>	
7.4 Please explain how data subjects may exercise their rights (rights of access, of rectification, of blocking, of erasure and to object):	By sending an email to efficient_printing@ep.europa.eu. Their requests will be analysed and processed. Additional features have been requested (to the solutions' provider - Canon) in order to be able to reply to data subjects' requests.	
7.5 Processor	Is the processing operation carried out by a processor?	YES: <input type="checkbox"/> NO: <input checked="" type="checkbox"/>
	If "YES": Has a data protection clause been added in the contract?	N/A

<b>8. FURTHER INFORMATION</b>
<i>Give any information you consider relevant and indicate the heading it refers to:</i>

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**The “Data Controller in practice” declares the accuracy of the above statements and undertakes to update any change affecting this information.**

Signature of the “Data Controller in practice”:



## DATA PROTECTION SERVICE

### NOTIFICATION

### OF PERSONAL DATA PROCESSING

Art. 25 of Regulation (EC) 45/2001 of the European Parliament and the Council of 18 December 2000

**EUROPEAN PARLIAMENT**

(For the use of Data Protection Service)

**Notification no.:**

**Date received:**

12-02-2019

In accordance with Regulation (EC) 45/2001, individuals whose personal data are processed by the European Parliament in any context whatsoever are to be protected with regard to the processing of personal data.

#### 1. IDENTIFICATION OF THE DATA CONTROLLER OR ANY SYSTEM

The data controller is the unit or other organisational entity which, alone or jointly with others, determines the purposes and means of the processing of personal data.

SURNAME [REDACTED] Given name [REDACTED] E-mail [REDACTED]  
Function **Head of Unit**  
Administrative Address: Building and room [REDACTED] Tel. [REDACTED] Place of work **Luxembourg**

Personal data filing system means any structured set of personal data accessible according to specific criteria

Name of filing system **Multifunctional devices for printing, copying and scanning with authentication process**  
Instance(s) responsible for processing **Printing Unit**  
Building and room [REDACTED] Place of work **Luxembourg**

#### 2. PURPOSE AND LEGAL BASIS OF PROCESSING

Personal data must be processed only for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes.

2.1 Indicate the purpose of this processing of personal data (Please, described the procedure linked to this operation):

**The multifunctional devices (MFDs) use personal data to provide more efficiency, more security, and modern new features. It gives the possibility to send jobs for printing (files to print) from PCs or mobile devices.**

**These devices require user authentication:**

- The first time: necessity to register the EP badge (ID and password from the EP LDAP required),
- The next times: necessity to scan the EP badge.

**After scanning their EP badge on the MFDs, the data subjects (users) have access to different parameters where they can choose to modify, print or delete files (previously sent to the printer) or to scan or copy files.**

**Anonymised data will be used for statistical purposes in order to have a better overview of the paper and toner consumption.**

2.2 Indicate any legal basis (Treaty, Regulation, Decision, etc.) for this processing operation:

**Article 5 (1.a) of Regulation (EU) 2018/1725 - Task carried out in the public interest or in the exercise of official authority vested in the Union institution or body.**

2.3 Does this processing allow linkages between data processed for different purposes?  yes  no

2.4 Lawfulness: Indicate if

- 2.4.1 \*  the processing meets a functional need of the service
- 2.4.2 \*  the data subject has unambiguously consented to the processing
- 2.4.3 \*  any other basis, please specify

### 3. CATEGORIES OF DATA

'Personal data' means any information on an identified or identifiable natural person. Indicate all the categories of data contained in the file.

#### 3.1 Categories of personal data

- |        |                                     |   |        |                                     |   |
|--------|-------------------------------------|---|--------|-------------------------------------|---|
| 3.1.1  | <input type="checkbox"/>            | data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct) | 3.1.2  | <input type="checkbox"/>            | concerning the data subject's family            |
| 3.1.3  | <input type="checkbox"/>            | data relating to suspected offences, offences, criminal convictions or security measures        | 3.1.4  | <input type="checkbox"/>            | concerning the data subject's career            |
| 3.1.5  | <input type="checkbox"/>            | processing for the purpose of excluding individuals from a right, benefit or contract           | 3.1.6  | <input type="checkbox"/>            | concerning leave and absences                   |
| 3.1.7  | <input checked="" type="checkbox"/> | in the form of personal identification numbers  | 3.1.8  | <input type="checkbox"/>            | concerning missions and journeys                |
| 3.1.9  | <input type="checkbox"/>            | concerning the physical characteristics of persons as well as the image, voice or fingerprints  | 3.1.10 | <input type="checkbox"/>            | concerning Social Security and pensions         |
| 3.1.11 | <input type="checkbox"/>            | concerning the data subject's private sphere  | 3.1.12 | <input type="checkbox"/>            | concerning expenses and medical benefits        |
| 3.1.13 | <input type="checkbox"/>            | concerning pay, allowances and bank accounts  | 3.1.14 | <input checked="" type="checkbox"/> | concerning telephone numbers and communications |
| 3.1.15 | <input type="checkbox"/>            | concerning recruitment and contracts  | 3.1.16 | <input checked="" type="checkbox"/> | other   |

Civil status data and identification (First name, last name, badge number)  
Data related to the professional sphere (Unit, Directorate, email)  
Technical data (Windows user ID, password, username, technical job name [print, copy, scan job], date of the job and personal data included in the printing, copying and scanning data)

#### 3.2 Special categories of data such as defined in Article 10 of Regulation EC n°45/2001

- |       |                          |  |       |                          |                                  |
|-------|--------------------------|--|-------|--------------------------|----------------------------------|
| 3.2.1 | <input type="checkbox"/> | revealing racial or ethnic origin            | 3.2.2 | <input type="checkbox"/> | revealing trade-union membership |
| 3.2.3 | <input type="checkbox"/> | concerning political opinions                | 3.2.4 | <input type="checkbox"/> | concerning health                |
| 3.2.5 | <input type="checkbox"/> | revealing religious or philosophical beliefs | 3.2.6 | <input type="checkbox"/> | concerning sex life              |

#### 3.3 Please list the personal data processed

First name, last name, email, Unit, Directorate, badge number, Windows user ID, password, username, technical job name (print, copy, scan job), date of the job and personal data included in the printing, copying and scanning data.

### 4. DATA PROCESSING

'Data processing' means any operation carried out on personal data, whether or not by automated means.

#### 4.1 Collection of data

- |       |                                     |   |       |                                     |  |
|-------|-------------------------------------|---|-------|-------------------------------------|--|
| 4.1.1 | <input checked="" type="checkbox"/> | collection from the data subject (direct) | 4.1.2 | <input checked="" type="checkbox"/> | other source of collection (indirect) - please specify<br>Personal data retrieved from the Active directory.<br>All information is imported via several LDAP connectors to the Active directory. |
|-------|-------------------------------------|---|-------|-------------------------------------|--|

#### 4.2 Processing of data

- |       |                                     |  |
|-------|-------------------------------------|--|
| 4.2.1 | <input checked="" type="checkbox"/> | processing automated wholly or in part   |
| 4.2.2 | <input type="checkbox"/>            | non-automated processing of data intended to form part of a filing system            |
| 4.2.3 | <input type="checkbox"/>            | manual processing of a structured set of data accessible according to given criteria |

#### 4.3 Storage of data

##### 4.3.1 Indicate the period of storage and its justification:

For the printing, personal data are kept up in encrypted form to 96 hours since the creation of the printing jobs (when the files are sent to print). During this period, the retention period may be reduced depending on data subjects actions (delete, print, print + delete). => cf. Part 8 Further Info.

For the copying, personal data are kept in encrypted form on the multifunctional devices during the time of the copying process. For the scanning, personal data are kept in encrypted form on the multifunctional devices during the time of the scanning process. Personal data are then transferred to the scan destinations chosen by the data subjects. The retention period for these transferred personal data are the ones established for each system of destination.

Encrypted records in databases (stored on European Parliament servers) are generated during the processing operations. Personal data will be retained for a maximum of 18 months from the moment they are collected.

- |       |   |                                     |     |                          |    |
|-------|---|-------------------------------------|-----|--------------------------|----|
| 4.3.2 | Is any further processing for historical, statistical or scientific purposes envisaged? | <input checked="" type="checkbox"/> | yes | <input type="checkbox"/> | no |
|-------|---|-------------------------------------|-----|--------------------------|----|

Indicate the form of storage used (anonymous, encrypted, other)

If it is required to retain the data after this period for statistics/analysis purposes, it will be anonymised.

4.3.3 Indicate the date or period of the beginning of the processing operations:

Autumn 2018

4.3.4 Indicate the date or period of the ending of the processing operations:

Not foreseen

4.4 File location

4.4.1  standalone PC

4.4.2  Parliament network. If the filing system is available on a network, indicate the location of the server:  
// Data center (OPERATIONS)

4.4.3  interinstitutional network (indicate the institution(s) involved)

4.4.4  internet http://

4.4.5  intranet http://

4.4.6  other

## 5. RECIPIENTS & DATA TRANSFER

5.1 Recipients or categories of recipients to whom data are disclosed (physical or legal persons, administrations, companies, etc.):

Personal data are stored exclusively with restricted access on internal European Parliament servers. These personal data are accessible to the application owner (PRINTING Unit) and to a limited number of back-office staff members (OPERATIONS Unit).

If the data controller envisages transferring personal data, please answer the questions in this section.

5.2 In case of transfer within or between EU institutions or bodies:

N/A

5.2.1 Have the data been transferred following a request from the recipient?  yes  no

5.2.2 Has the data controller verified the competence of the recipient and made a provisional evaluation of the need for the transfer of the data?  yes  no

5.2.3 Has the recipient been informed of his obligations in respect of this transfer?  yes  no

5.3 In case of transfer to recipients other than the EU institutions and bodies, subject to Directive 95/46/EC (e.g. national administrations, private sector):

N/A

5.3.1 Has the recipient established that the data are necessary?  yes  no

5.3.2 Has the recipient established the need for their transfer?  yes  no

5.4 In case of transfer to recipients outside the EU (please specify the legal basis, the nature of the data transmitted and their recipient):

N/A

5.4.1 Has the person responsible for the transfer established that an adequate level of protection is ensured in the country of the recipient?  yes  no

5.5 Is the transfer carried out by a sub-contractor?  yes  no

## 6. SECURITY OF PROCESSING

*The data controller must implement the appropriate technical and organisational measures to ensure an appropriate security level with a view to the prevention of any unauthorised distribution or access, any accidental or illicit destruction, any accidental loss or deterioration, as well as any other form of illicit processing. Give a general description allowing a preliminary evaluation of the adequacy of the measures taken to ensure the security of processing*

- 6.1 Physical security (access to computer systems, quality of the file supports, public access or restricted access to locations, storage, transport of equipment, etc.)  
The new devices require user a physical authentication  
When data subject (user) send files to print (job for printing) from a device (PC or mobile device), he/she can only collect his/her files after authentication.  
Authentication process:  
- First authentication: the user gives his/her credentials and badge number (by scanning it).  
- Next authentications: the user gives only his/her badge number (by scanning it).  
Servers storing personal data have a physical access strictly limited.  
HDD Erase function: The HDD Data Erase will automatically overwrite and erase image data immediately after the job is completed; therefore, no trace of the data remains on the hard disk. It will perform an overwrite up to 3 times (DoD 5220.22M 3 pass) with random data for maximum security protection.
- 6.2 IT system(s) security (coding control, undue removal or transmission of data, passwords, encrypted directories, backup, audit trails for data processing and communication, etc.)  
The HDD Data Encryption uses AES256-bit length encryption keys. This ensures that the data stored on the hard disk is protected against leakage of confidential information by theft of the hard disk.  
Data are encrypted for the printing, scanning and copying.  
Print server Spool file encryption protect files spooled to await on servers.  
Encrypted Secure Print protect print jobs from being output at the device unattended.
- 6.3 Staff security (restricted access codes, conditions of subcontracting, etc.)  
Concerning the accounting data in database (Statistics): accounting and reporting information are only available for the "Admin" ACL (Access Control List) group.

## 7. DATA SUBJECTS

*The persons to be protected are identified or identifiable natural persons whose personal data are processed by the European Parliament in any context whatsoever.*

- 7.1 Category (or categories) of data subjects (officials, other staff, contractors, European citizens, etc.):  
- Officials  
- Other internal staff (e.g. Trainees, Temporary agents)  
- Contract agents  
- MEPs  
- APAs (Parliamentary Assistants)
- 7.2 Indicate the measures taken or envisaged to inform the data subject of the identity of the data controller, of any communication of data concerning him or her, and of his or her rights:  
There are two communication tools to inform the data subject:  
- Privacy Notice (on posters placed next to the printers and included in relevant intranet pages and emails of communication) notifying the data subjects of the processing of personal data and inviting them to see the Privacy Statement for further information on the processing.  
- Privacy Statement (published on a dedicated intranet page) informing data subjects of all mandatory elements mentioned in Article 15 and 16 of Regulation (EU) 2018/1725.
- 7.3 Have any natural or legal persons employed by or under contract to the European Parliament received any instructions about confidentiality in processing personal data?  yes  no
- 7.4 Please explain how data subjects may exercise their rights (rights of access, of rectification, of blocking, of erasure and to object):  
By sending an email to [efficient\\_printing@ep.europa.eu](mailto:efficient_printing@ep.europa.eu).  
Their requests will be analysed and processed.  
Additional features have been requested (to the solutions' provider - Canon) in order to be able to reply to data subjects' requests.
- 7.5 If the processing operation is carried out by a processor, has a data protection clause been added in the contract?  yes  no

## 8. FURTHER INFORMATION

*Give any information you consider relevant and indicate the heading it refers to:*

### In 4.1.1:

During the authentication process, the user gives his/her credentials and badge number (first authentication) then only his/her badge number (next authentications).

The badge number is given by just scanning the badge on the dedicated zone of the device.

Then the data subject has the possibility to insert, modify and delete a file or a configuration.

### In 4.3.1 (one clarification):

For the printing, personal data are kept up in encrypted form to 96 hours since the creation of the printing jobs (when the files are sent to print). During this period, the data subjects have the possibility on the multifunctional devices:

-To delete files to print (in this case personal data are automatically deleted).

-To print files (in this case personal data are moved in the "Printed Jobs" tab and deleted at the end of the 96 hours).

-To print and delete files via the feature "Print + Delete" available in the "Options" window (in this case personal data are automatically deleted).

*Pursuant to Article 26 of Regulation (EC) 45/2001, the information given above is, except for item 6, intended to appear in the register of the notified personal data processing operations of the European Parliament. This register, placed by this Regulation under the responsibility of the Data Protection Officer of the European Parliament, is intended for public information to ensure that data subjects may ascertain the existence of filing systems containing personal data, in order to enable them to exercise their rights in accordance with that Regulation. Any person may consult the register directly or indirectly through the European Data Protection Supervisor. The data controller is required to provide all the information requested by the Data Protection Officer and has a right of access to and rectification of these data. Data appearing in this register will be preserved for the duration necessary for the accomplishment of the purpose for which they have been collected. Any data subject and any person employed by an institution or Community body may lodge a complaint with the European Data Protection Supervisor for violation of the Regulation, and may bring an action before the Court of Justice of the European Communities. Any failure to comply with obligations pursuant to the Regulation, whether intentionally or through negligence makes an official or other servant liable to disciplinary action.*

**The data controller declares the accuracy of the above statements and undertakes to notify any change affecting this information to the Data Protection Officer of the European Parliament.**

Date:

Signature of data controller

See the instructions at the bottom of this notification

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\* The signed notification is to be sent within 10 days to the Data Protection Officer of the European Parliament, KAD 02G028, Luxembourg

\* For further information please consult the intranet site of the European Parliament

[http://www.epintranet.ep.parl.union.eu/intranet/ep/lang/en/content/administrative\\_life/personnel/data\\_protection\\_1/](http://www.epintranet.ep.parl.union.eu/intranet/ep/lang/en/content/administrative_life/personnel/data_protection_1/)

or write to: Data-Protection@europarl.europa.eu

# Privacy Statement related to the multifunctional devices for printing, copying and scanning with authentication process

[Legal basis of the processing](#)

[Who is responsible for your data?](#)

[What are your rights regarding your personal data and how can you exercise them?](#)

[What are the personal data used?](#)

[Why are the personal data used and who can view them?](#)

[How long are the personal data kept?](#)

## **Legal basis of the processing**

The processing described below is carried out in accordance with [Regulation \(EU\) 2018/1725](#) (hereinafter ‘**the Regulation**’). The lawfulness of the processing is based on Article 5 (1.a) interpreted in the light of Preamble (Recital 22), since it is necessary for the performance of tasks carried out in the public interest by the European Parliament.

## **Who is responsible for your data?**

The data controller for this processing of personal data is the European Parliament and in particular [REDACTED] (DG ITEC/EDIT/PRINTING).

## **What are your rights regarding your personal data and how can you exercise them?**

You, as a data subject, or your legal representative when applicable, may exercise the rights indicated hereafter by sending a request directly to [efficient\\_printing@ep.europa.eu](mailto:efficient_printing@ep.europa.eu).

You have the right of access your personal data and relevant information concerning how the data controller uses them [Article 17 of the Regulation]. You have the right to obtain the rectification of your inaccurate personal data and, taking into account the purposes of the processing, of your incomplete personal data [Article 18 of the Regulation]. Under certain conditions, you have the right to ask that the data controller deletes your personal data or restricts their use [Articles 19 and 20 of the Regulation]. You have the right to object to the processing of your personal data, on grounds relating to your particular situation, at any time [Article 23 of the Regulation].

The data controller will consider your request, take a decision and communicate it to you.

You have the right to have recourse at any time to the Data Protection Officer of the European Parliament (DPO) via the email address [data-protection@europarl.europa.eu](mailto:data-protection@europarl.europa.eu) and to the European Data Protection Supervisor (EDPS) via the email address [edps@edps.europa.eu](mailto:edps@edps.europa.eu).

## What are the personal data used?

The multifunctional devices (MFDs) use the following categories of personal data: first name, last name, email, Unit, Directorate, badge number, Windows user ID, password, username, technical job name (print, copy, scan job), date of the job and personal data included in the printing, copying and scanning data. These personal data are collected directly from you when you are using the multifunctional devices (e.g. sending a file to print, launch the printing process on the printer) and indirectly from the Windows directory service (i.e. Windows user ID, first name, last name, email).

## Why are the personal data used and who can view them?

The multifunctional devices (MFDs) use encrypted personal data to provide more efficiency, more security and modern new features for printing, copying and scanning. For instance, you can send files to print (print jobs) from PCs or mobile devices. Then, you will have the possibility to print your files (previously sent) only after scanning your badge, therefore avoiding physical interceptions.

Personal data are encrypted and stored exclusively with restricted access on internal European Parliament servers. These personal data are accessible to the application owner (PRINTING Unit) and to a limited number of back-office staff members (OPERATIONS Unit).

Anonymised data will be used for statistical purposes in order to have a better overview of the paper and toner consumption.

## How long are the personal data kept?

For the printing, personal data are kept up to 96 hours in encrypted form since the creation of the printing jobs (when the files are sent to print). During this period, you have the possibility on the multifunctional devices:

- ) To delete the files to print (in this case personal data are automatically deleted).
- ) To print the files (in this case personal data are moved in the “Printed Jobs” tab and deleted at the end of the 96 hours).
- ) To print and delete the files via the feature “Print + Delete” available in the “Options” window (after performing this action, personal data are automatically deleted).

For the copying, personal data are kept in encrypted form on the multifunctional devices during the time of the copying process.

For the scanning, personal data are kept in encrypted form on the multifunctional devices during the time of the scanning process. Personal data are then transferred to the scan destinations that you choose. The retention period for these transferred personal data are the ones established for each system of destination.

Encrypted records in databases (stored on European Parliament servers) are generated during the processing operations. Personal data will be retained for a maximum of 18 months from the moment they are collected.

In case of investigation, personal data may be kept for a longer time necessary to conduct the investigation.



# Privacy Notices related to the multifunctional devices for printing, copying and scanning with authentication process

## **On ITECnet (longer version)**

After scanning your badge, these multifunctional devices connect to internal servers to manage and execute your requests for printing, copying and scanning. These features use encrypted personal data - processed in accordance with Regulation (EU) 2018/1725 - to provide flexible usages and to avoid physical and electronic interceptions. The data used for printing, copying and scanning are stored exclusively on the internal European Parliament network. For more information on the use of your personal data, please see the Privacy Statement [\[LINK\]](#).

## **On Posters**

After scanning your badge, these devices connect to internal servers to manage your requests for printing, copying and scanning. These features use encrypted personal data - processed in accordance with Regulation (EU) 2018/1725 - to provide flexible usages and to avoid physical/electronic interceptions. For more details, please contact [efficient\\_printing@ep.europa.eu](mailto:efficient_printing@ep.europa.eu).

**From:** [REDACTED]  
**Sent:** 15 May 2019 17:29  
**To:** CASTILLEJO-MARTINEZ Maria  
**Cc:** [REDACTED] European Data Protection Supervisor  
**Subject:** Request for information | 2019-0373

Dear [REDACTED],

I hope this email finds you very well. I'm writing you regarding the informal consultation on the European Parliament's 'efficient printing' system (EDPS case file 2019-0373).

We thank you for the additional information you provided by email on 17/04/2019.

After the analysis of the documentation sent, we kindly ask you to clarify the following four points:

**1. Anonymous data**

The personal data processing record states on page 3 that '[a]nonymised data will be used for statistical purposes in order to have a better overview of the paper and toner consumption'. Could you please provide additional details on what kind of anonymous data will you collect for statistical purposes and why you deem that such data should be considered anonymous. Is it, for example, 800 pages, toner consumption 50% on week 15?

**2. Complete diagram of the data flow**

If available, could you please provide us with a complete diagram of the dataflow of the 'efficient printing' system.

**3. Data retention period**

The personal data processing record states on page 5 that '[e]ncrypted records in databases (stored on the European Parliament servers) are generated during the processing operations. Personal data will be retained for a maximum of 18 months from the moment they are collected'. Could you please clarify the need for this data retention and what kind of personal data will be retained.

**4. Data encryption**

You mention the type of encryption for the HDD data. Do you use the same encryption method (AES256-bit) for the other encrypted system?

We would appreciate if you could send us the information requested above by 11 June.

Thank you in advance for your collaboration.

Kind regards,



[REDACTED]

[REDACTED]  
**European Data Protection Supervisor**  
Postal address: Rue Wiertz 60, B-1047 Brussels  
Office address: Rue Montoyer 30, B-1000 Brussels  
[@EU EDPS](#) [www.edps.europa.eu](http://www.edps.europa.eu)

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**From:** [REDACTED]  
**Sent:** 11 June 2019 18:37  
**To:** [REDACTED]  
**Cc:** [REDACTED] European Data Protection Supervisor; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373  
**Attachments:** Consumables\_ALL\_with\_EPLO\_29\_5\_2019\_\_.XLSX

Dear [REDACTED]

Thank you for your attention to the analysis of the document presented. We are pleased to answer your questions with the following explanations per point raised.

**1. Anonymous data**

The statistics carried out are based on standard requests where anonymous results have a minimum level of granularity per machine assigned to an organisational entity (e.g. a Directorate, a Unit, a Service). The data processed are the number and type of printed pages, the colorimetric mode (color, black and white) and the printing date. These are global statistics used to determine the most appropriate allocation of printing resources in terms of paper and printer cartridges.  
Please find attached some examples of these global statistics.

**2. Complete diagram of the data flow**

The application owner is in contact with the solution provider (Canon) to obtain a complete diagram of the data flow of the ePrinting system.

**3. Data retention**

We mentioned 18 months since we were aware of an existing script exchanged with the European Commission to reduce the data retention period. However, we need now to reconsider this retention period since we have recently received a request from the Directorate-General for Personnel (DG PERS) of the European Parliament to keep personal data for a longer period to be used in inquiries and disciplinary cases. In the context of Article 86 of the Staff Regulations (and their Annex IX) and the general implementing provisions governing disciplinary proceedings and administrative investigations, DG PERS would propose the retention period of the discharge plus two years, given that no retention period is foreseen in those legal basis.  
Your advice on this would be very useful.

**4. Data encryption**

As it is presented in the description of the processing, the HDD Data Encryption (using AES256-bit encryption) protects data stored on the hard disk.

At the software level, the Canon solution (uniFLOW) also uses AES 256-bit encryption to protect print job data while in transmission over the network. To protect print jobs from being output from an unattended device, the encrypted secured printing feature holds the job in a queue until the user releases the job using one of the agreed authentication methods.

I hope these clarifications are useful, do not hesitate should you have any question or need further clarification.

[REDACTED]



[REDACTED]  
European Parliament  
Directorate-General for Innovation and Technological Support

[REDACTED]  
[www.europarl.europa.eu](http://www.europarl.europa.eu)

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**From:** [REDACTED]  
**Sent:** 15 May 2019 17:29  
**To:** [REDACTED]  
**Cc:** [REDACTED]; European Data Protection Supervisor  
**Subject:** Request for information | 2019-0373

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Kind regards,



[Redacted]  
[Redacted]  
**European Data Protection Supervisor**  
Postal address: Rue Wiertz 60, B-1047 Brussels  
Office address: Rue Montoyer 30, B-1000 Brussels  
[@EU\\_EDPS](#) [www.edps.europa.eu](http://www.edps.europa.eu)

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Printer Name	IP Address	Serial #	Color	Level	Type	Output	Total
EPRT00001BMBRU	10.53.33.193	XXT00999	black	43,0%	Toner	B/W	12.454
EPRT00002BMBRU	10.53.97.2	XXT00992	black	43,0%	Toner	B/W	9.658
EPRT00003BMBRU	10.53.97.1	XXT00996	black	62,0%	Toner	B/W	5.322
EPRT00004CMBRU	10.54.225.32	XVC05059	black	50,0%	Toner	Color	40.833
EPRT00004CMBRU	10.54.225.32	XVC05059	cyan	68,0%	Toner	Color	40.833
EPRT00004CMBRU	10.54.225.32	XVC05059	magenta	73,0%	Toner	Color	40.833
EPRT00004CMBRU	10.54.225.32	XVC05059	yellow	66,0%	Toner	Color	40.833
EPRT00005CMBRU	10.54.97.6	XVC05056	black	99,0%	Toner	Color	67
EPRT00005CMBRU	10.54.97.6	XVC05056	cyan	99,0%	Toner	Color	67
EPRT00005CMBRU	10.54.97.6	XVC05056	magenta	99,0%	Toner	Color	67
EPRT00005CMBRU	10.54.97.6	XVC05056	yellow	99,0%	Toner	Color	67
EPRT00006BMLUX	10.24.13.103	XXT00991	black	69,0%	Toner	B/W	6.189
EPRT00007BMLUX	192.168.78.209	XXT00990	black	57,0%	Toner	B/W	4.427
EPRT00008BMLUX	10.24.13.105	XXT00998	black	75,0%	Toner	B/W	195
EPRT00009CMLUX	10.21.13.72	XVC05508	black	91,0%	Toner	Color	7.509
EPRT00009CMLUX	10.21.13.72	XVC05508	cyan	94,0%	Toner	Color	7.509
EPRT00009CMLUX	10.21.13.72	XVC05508	magenta	94,0%	Toner	Color	7.509
EPRT00009CMLUX	10.21.13.72	XVC05508	yellow	93,0%	Toner	Color	7.509
EPRT00010CMLUX	10.48.33.11	XVC05613	black	92,0%	Toner	Color	6.909
EPRT00010CMLUX	10.48.33.11	XVC05613	cyan	95,0%	Toner	Color	6.909
EPRT00010CMLUX	10.48.33.11	XVC05613	magenta	96,0%	Toner	Color	6.909
EPRT00010CMLUX	10.48.33.11	XVC05613	yellow	94,0%	Toner	Color	6.909
EPRT00011BMSTR	10.224.13.5	XXT00947	black	77,0%	Toner	B/W	66
EPRT00012BMSTR	10.224.13.6	XXT00952	black	78,0%	Toner	B/W	1.105
EPRT00013BMSTR	10.224.13.7	XXT00945	black	79,0%	Toner	B/W	362
EPRT00014CMSTR	10.224.13.8	XVC05270	black	98,0%	Toner	Color	1.183
EPRT00014CMSTR	10.224.13.8	XVC05270	cyan	99,0%	Toner	Color	1.183
EPRT00014CMSTR	10.224.13.8	XVC05270	magenta	99,0%	Toner	Color	1.183
EPRT00014CMSTR	10.224.13.8	XVC05270	yellow	99,0%	Toner	Color	1.183
EPRT00015CMSTR	10.224.13.9	XVC05042	black	98,0%	Toner	Color	728
EPRT00015CMSTR	10.224.13.9	XVC05042	cyan	99,0%	Toner	Color	728
EPRT00015CMSTR	10.224.13.9	XVC05042	magenta	99,0%	Toner	Color	728
EPRT00015CMSTR	10.224.13.9	XVC05042	yellow	99,0%	Toner	Color	728
EPRT00016CMBRU	10.52.161.1	XVC03723	black	71,0%	Toner	Color	22.178
EPRT00016CMBRU	10.52.161.1	XVC03723	cyan	80,0%	Toner	Color	22.178
EPRT00016CMBRU	10.52.161.1	XVC03723	magenta	81,0%	Toner	Color	22.178
EPRT00016CMBRU	10.52.161.1	XVC03723	yellow	79,0%	Toner	Color	22.178
EPRT00017CMBRU	10.52.33.4	XVC03587	black	53,0%	Toner	Color	27.875
EPRT00017CMBRU	10.52.33.4	XVC03587	cyan	83,0%	Toner	Color	27.875
EPRT00017CMBRU	10.52.33.4	XVC03587	magenta	81,0%	Toner	Color	27.875
EPRT00017CMBRU	10.52.33.4	XVC03587	yellow	78,0%	Toner	Color	27.875
EPRT00018CMBRU	10.52.33.6	XVC03584	black	19,0%	Toner	Color	57.039
EPRT00018CMBRU	10.52.33.6	XVC03584	cyan	86,0%	Toner	Color	57.039
EPRT00018CMBRU	10.52.33.6	XVC03584	magenta	85,0%	Toner	Color	57.039
EPRT00018CMBRU	10.52.33.6	XVC03584	yellow	83,0%	Toner	Color	57.039

EPRT00019CMBRU	10.52.33.2	XVC03736	black	65,0%	Toner	Color	27.802
EPRT00019CMBRU	10.52.33.2	XVC03736	cyan	80,0%	Toner	Color	27.802
EPRT00019CMBRU	10.52.33.2	XVC03736	magenta	78,0%	Toner	Color	27.802
EPRT00019CMBRU	10.52.33.2	XVC03736	yellow	76,0%	Toner	Color	27.802
EPRT00020CMBRU	10.52.33.8	XVC03711	black	5,0%	Toner	Color	68.944
EPRT00020CMBRU	10.52.33.8	XVC03711	black	92,0%	Toner	Color	71.899
EPRT00020CMBRU	10.52.33.8	XVC03711	cyan	57,0%	Toner	Color	71.899
EPRT00020CMBRU	10.52.33.8	XVC03711	magenta	61,0%	Toner	Color	71.899
EPRT00020CMBRU	10.52.33.8	XVC03711	yellow	48,0%	Toner	Color	71.899
EPRT00021CMBRU	10.52.33.7	XVC03633	black	67,0%	Toner	Color	22.611
EPRT00021CMBRU	10.52.33.7	XVC03633	cyan	86,0%	Toner	Color	22.611
EPRT00021CMBRU	10.52.33.7	XVC03633	magenta	87,0%	Toner	Color	22.611
EPRT00021CMBRU	10.52.33.7	XVC03633	yellow	85,0%	Toner	Color	22.611
EPRT00022CMBRU	10.52.33.5	XVC03545	black	37,0%	Toner	Color	50.830
EPRT00022CMBRU	10.52.33.5	XVC03545	cyan	74,0%	Toner	Color	50.830
EPRT00022CMBRU	10.52.33.5	XVC03545	magenta	68,0%	Toner	Color	50.830
EPRT00022CMBRU	10.52.33.5	XVC03545	yellow	68,0%	Toner	Color	50.830
EPRT00023CMBRU	10.52.33.3	XVC03554	black	90,0%	Toner	Color	7.179
EPRT00023CMBRU	10.52.33.3	XVC03554	cyan	95,0%	Toner	Color	7.179
EPRT00023CMBRU	10.52.33.3	XVC03554	magenta	95,0%	Toner	Color	7.179
EPRT00023CMBRU	10.52.33.3	XVC03554	yellow	96,0%	Toner	Color	7.179
EPRT00024CMBRU	10.52.161.6	XVC03712	black	56,0%	Toner	Color	30.026
EPRT00024CMBRU	10.52.161.6	XVC03712	cyan	66,0%	Toner	Color	30.026
EPRT00024CMBRU	10.52.161.6	XVC03712	magenta	70,0%	Toner	Color	30.026
EPRT00024CMBRU	10.52.161.6	XVC03712	yellow	68,0%	Toner	Color	30.026
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EPRT00025CMBRU	10.52.33.1	XVC03702	black	0,0%	Toner	Color	105.007
EPRT00025CMBRU	10.52.33.1	XVC03702	black	92,0%	Toner	Color	109.541
EPRT00025CMBRU	10.52.33.1	XVC03702	cyan	12,0%	Toner	Color	109.541
EPRT00025CMBRU	10.52.33.1	XVC03702	magenta	8,0%	Toner	Color	109.541
EPRT00025CMBRU	10.52.33.1	XVC03702	yellow	5,0%	Toner	Color	109.541
EPRT00026CMBRU	10.53.161.16	XVC03548	black	97,0%	Toner	Color	2.958
EPRT00026CMBRU	10.53.161.16	XVC03548	cyan	97,0%	Toner	Color	2.958
EPRT00026CMBRU	10.53.161.16	XVC03548	magenta	94,0%	Toner	Color	2.958
EPRT00026CMBRU	10.53.161.16	XVC03548	yellow	93,0%	Toner	Color	2.958
EPRT00027CMBRU	10.54.225.6	XVC03558	black	12,0%	Toner	Color	63.738
EPRT00027CMBRU	10.54.225.6	XVC03558	cyan	51,0%	Toner	Color	63.738
EPRT00027CMBRU	10.54.225.6	XVC03558	magenta	48,0%	Toner	Color	63.738
EPRT00027CMBRU	10.54.225.6	XVC03558	yellow	41,0%	Toner	Color	63.738
EPRT00028CMBRU	10.54.225.3	XVC03556	black	5,0%	Toner	Color	78.744
EPRT00028CMBRU	10.54.225.3	XVC03556	black	60,0%	Toner	Color	104.352
EPRT00028CMBRU	10.54.225.3	XVC03556	cyan	22,0%	Toner	Color	104.352
EPRT00028CMBRU	10.54.225.3	XVC03556	magenta	18,0%	Toner	Color	104.352
EPRT00028CMBRU	10.54.225.3	XVC03556	yellow	8,0%	Toner	Color	104.352
EPRT00029CMBRU	10.54.225.9	XVC03724	black	44,0%	Toner	Color	40.819

EPRT00029CMBRU	10.54.225.9	XVC03724	cyan	72,0%	Toner	Color	40.819
EPRT00029CMBRU	10.54.225.9	XVC03724	magenta	74,0%	Toner	Color	40.819
EPRT00029CMBRU	10.54.225.9	XVC03724	yellow	72,0%	Toner	Color	40.819
EPRT00030CMBRU	10.54.225.5	XVC03553	black	0,0%	Toner	Color	63.083
EPRT00030CMBRU	10.54.225.5	XVC03553	black	82,0%	Toner	Color	72.842
EPRT00030CMBRU	10.54.225.5	XVC03553	cyan	44,0%	Toner	Color	72.842
EPRT00030CMBRU	10.54.225.5	XVC03553	magenta	40,0%	Toner	Color	72.842
EPRT00030CMBRU	10.54.225.5	XVC03553	yellow	39,0%	Toner	Color	72.842
EPRT00031CMBRU	10.54.225.8	XVC03722	black	5,0%	Toner	Color	60.661
EPRT00031CMBRU	10.54.225.8	XVC03722	black	98,0%	Toner	Color	61.335
EPRT00031CMBRU	10.54.225.8	XVC03722	cyan	46,0%	Toner	Color	61.335
EPRT00031CMBRU	10.54.225.8	XVC03722	magenta	42,0%	Toner	Color	61.335
EPRT00031CMBRU	10.54.225.8	XVC03722	yellow	38,0%	Toner	Color	61.335
EPRT00032CMBRU	10.53.97.6	XVC07963	black	83,0%	Toner	Color	12.273
EPRT00032CMBRU	10.53.97.6	XVC07963	cyan	91,0%	Toner	Color	12.273
EPRT00032CMBRU	10.53.97.6	XVC07963	magenta	92,0%	Toner	Color	12.273
EPRT00032CMBRU	10.53.97.6	XVC07963	yellow	91,0%	Toner	Color	12.273
EPRT00033CMBRU	10.52.161.7	XVC03552	black	91,0%	Toner	Color	7.569
EPRT00033CMBRU	10.52.161.7	XVC03552	cyan	95,0%	Toner	Color	7.569
EPRT00033CMBRU	10.52.161.7	XVC03552	magenta	95,0%	Toner	Color	7.569
EPRT00033CMBRU	10.52.161.7	XVC03552	yellow	95,0%	Toner	Color	7.569
EPRT00034CMBRU	10.53.97.3	XVC03557	black	43,0%	Toner	Color	40.707
EPRT00034CMBRU	10.53.97.3	XVC03557	cyan	70,0%	Toner	Color	40.707
EPRT00034CMBRU	10.53.97.3	XVC03557	magenta	73,0%	Toner	Color	40.707
EPRT00034CMBRU	10.53.97.3	XVC03557	yellow	70,0%	Toner	Color	40.707
EPRT00035CMBRU	10.53.97.4	XVC03720	black	59,0%	Toner	Color	33.536
EPRT00035CMBRU	10.53.97.4	XVC03720	cyan	73,0%	Toner	Color	33.536
EPRT00035CMBRU	10.53.97.4	XVC03720	magenta	77,0%	Toner	Color	33.536
EPRT00035CMBRU	10.53.97.4	XVC03720	yellow	76,0%	Toner	Color	33.536
EPRT00036CMBRU	10.53.225.16	XVC08114	black	0,0%	Toner	Color	54.977
EPRT00036CMBRU	10.53.225.16	XVC08114	black	0,0%	Toner	Color	111.872
EPRT00036CMBRU	10.53.225.16	XVC08114	black	39,0%	Toner	Color	143.733
EPRT00036CMBRU	10.53.225.16	XVC08114	cyan	16,0%	Toner	Color	143.733
EPRT00036CMBRU	10.53.225.16	XVC08114	magenta	10,0%	Toner	Color	143.733
EPRT00036CMBRU	10.53.225.16	XVC08114	yellow	10,0%	Toner	Color	143.733
EPRT00037CMBRU	10.53.225.8	XVC07964	black	0,0%	Toner	Color	76.072
EPRT00037CMBRU	10.53.225.8	XVC07964	black	42,0%	Toner	Color	106.201
EPRT00037CMBRU	10.53.225.8	XVC07964	cyan	12,0%	Toner	Color	106.201
EPRT00037CMBRU	10.53.225.8	XVC07964	magenta	24,0%	Toner	Color	106.201
EPRT00037CMBRU	10.53.225.8	XVC07964	yellow	19,0%	Toner	Color	106.201
EPRT00038CMBRU	10.53.161.3	XVC07969	black	67,0%	Toner	Color	16.072
EPRT00038CMBRU	10.53.161.3	XVC07969	cyan	85,0%	Toner	Color	16.072
EPRT00038CMBRU	10.53.161.3	XVC07969	magenta	75,0%	Toner	Color	16.072
EPRT00038CMBRU	10.53.161.3	XVC07969	yellow	84,0%	Toner	Color	16.072
EPRT00039BMBRU	10.53.97.5	XNW00578	black	59,0%	Toner	B/W	5.223



EPRT00040BMBRU	10.55.33.2	XNW00566	black	76,0%	Toner	B/W	3.218
EPRT00041BMBRU	10.52.33.20	XNW00562	black	13,0%	Toner	B/W	29.623
EPRT00042BMBRU	10.52.33.14	XNW00656	black	21,0%	Toner	B/W	17.363
EPRT00043BMBRU	10.52.33.15	XNW00671	black	14,0%	Toner	B/W	26.726
EPRT00044BMBRU	10.52.161.3	XNW00584	black	1,0%	Toner	B/W	41.888
EPRT00044BMBRU	10.52.161.3	XNW00584	black	19,0%	Toner	B/W	57.856
EPRT00045BMBRU	10.52.33.17	XNW00573	black	9,0%	Toner	B/W	33.761
EPRT00046BMBRU	10.53.33.68	XNW00574	black	72,0%	Toner	B/W	5.424
EPRT00047BMBRU	10.52.161.4	XNW00565	black	13,0%	Toner	B/W	18.550
EPRT00048BMBRU	10.52.33.23	XNW00572	black	53,0%	Toner	B/W	6.969
EPRT00049BMBRU	10.53.161.14	XNW00577	black	38,0%	Toner	B/W	12.625
EPRT00050BMBRU	10.52.161.5	XNW00526	black	60,0%	Toner	B/W	5.200
EPRT00051BMBRU	10.52.33.21	XNW00534	black	77,0%	Toner	B/W	3.045
EPRT00052BMBRU	10.54.161.1	XNW00559	black	40,0%	Toner	B/W	14.553
EPRT00053BMBRU	10.54.161.3	XNW00593	black	38,0%	Toner	B/W	13.817
EPRT00054BMBRU	10.54.161.2	XNW00591	black	62,0%	Toner	B/W	5.962
EPRT00055BMBRU	10.54.161.4	XNW00555	black	52,0%	Toner	B/W	7.951
EPRT00056BMBRU	10.53.161.1	XNW00579	black	63,0%	Toner	B/W	4.612
EPRT00057BMBRU	10.53.161.2	XNW00501	black	62,0%	Toner	B/W	5.635
EPRT00058BMBRU	10.54.225.1	XNW00673	black	73,0%	Toner	B/W	2.462
EPRT00059BMBRU	10.54.225.2	XNW00538	black	12,0%	Toner	B/W	35.111
EPRT00060BMBRU	10.54.225.4	XNW00560	black	13,0%	Toner	B/W	32.949
EPRT00061BMBRU	10.54.225.7	XNW00509	black	74,0%	Toner	B/W	2.324
EPRT00062BMBRU	10.53.33.33	XNW00686	black	8,0%	Toner	B/W	39.174
EPRT00063BMBRU	10.52.97.2	XNW00557	black	67,0%	Toner	B/W	3.283
EPRT00064BMBRU	10.52.97.3	XNW00568	black	17,0%	Toner	B/W	23.209
EPRT00065BMBRU	10.52.97.4	XNW00556	black	42,0%	Toner	B/W	12.415
EPRT00066BMBRU	10.53.33.1	XNW00594	black	0,0%	Toner	B/W	47.653
EPRT00066BMBRU	10.53.33.1	XNW00594	black	4,0%	Toner	B/W	96.064
EPRT00067BMBRU	10.53.33.2	XNW00583	black	2,0%	Toner	B/W	28.806
EPRT00068BMBRU	10.52.33.9	XNW00551	black	75,0%	Toner	B/W	2.044
EPRT00069BMBRU	10.53.225.15	XNW00536	black	10,0%	Toner	B/W	28.895
EPRT00070BMBRU	10.53.225.3	XNW00558	black	0,0%	Toner	B/W	45.726
EPRT00070BMBRU	10.53.225.3	XNW00558	black	14,0%	Toner	B/W	75.821
EPRT00071BMBRU	10.53.225.2	XNW00552	black	2,0%	Toner	B/W	40.662
EPRT00071BMBRU	10.53.225.2	XNW00552	black	12,0%	Toner	B/W	77.810
EPRT00072BMBRU	10.53.225.7	XNW00548	black	1,0%	Toner	B/W	46.731
EPRT00072BMBRU	10.53.225.7	XNW00548	black	5,0%	Toner	B/W	50.655
EPRT00072BMBRU	10.53.225.7	XNW00548	black	13,0%	Toner	B/W	90.116
EPRT00073BMBRU	10.53.225.10	XNW00549	black	0,0%	Toner	B/W	51.392
EPRT00073BMBRU	10.53.225.10	XNW00549	black	28,0%	Toner	B/W	72.419
EPRT00074BMBRU	10.53.225.6	XNW00535	black	0,0%	Toner	B/W	42.582
EPRT00074BMBRU	10.53.225.6	XNW00535	black	1,0%	Toner	B/W	88.363
EPRT00074BMBRU	10.53.225.6	XNW00535	black	5,0%	Toner	B/W	93.100
EPRT00074BMBRU	10.53.225.6	XNW00535	black	2,0%	Toner	B/W	95.527

EPRT00074BMBRU	10.53.225.6	XNW00535	black	99,0%	Toner	B/W	95.897
EPRT00075BMBRU	10.53.225.4	XNW00569	black	5,0%	Toner	B/W	48.489
EPRT00075BMBRU	10.53.225.4	XNW00569	black	6,0%	Toner	B/W	97.944
EPRT00076BMBRU	10.53.225.17	XNW00550	black	5,0%	Toner	B/W	38.385
EPRT00076BMBRU	10.53.225.17	XNW00550	black	43,0%	Toner	B/W	54.363
EPRT00077BMBRU	10.53.97.7	XNW00567	black	79,0%	Toner	B/W	799
EPRT00078BMBRU	10.53.225.5	XNW00571	black	5,0%	Toner	B/W	46.807
EPRT00078BMBRU	10.53.225.5	XNW00571	black	67,0%	Toner	B/W	59.567
EPRT00079BMBRU	10.53.225.11	XNW00677	black	1,0%	Toner	B/W	34.713
EPRT00079BMBRU	10.53.225.11	XNW00677	black	69,0%	Toner	B/W	36.764
EPRT00080BMBRU	10.53.225.13	XNW00679	black	12,0%	Toner	B/W	37.753
EPRT00081BMBRU	10.53.225.12	XNW00563	black	15,0%	Toner	B/W	25.217
EPRT00082BMBRU	10.53.225.9	XNW00575	black	12,0%	Toner	B/W	34.074
EPRT00083BMBRU	10.53.225.1	XNW00663	black	54,0%	Toner	B/W	5.816
EPRT00084BMLUX	10.48.33.1	XNW00512	black	13,0%	Toner	B/W	26.848
EPRT00085BMLUX	10.48.33.2	XNW00516	black	9,0%	Toner	B/W	38.544
EPRT00087BMLUX	10.48.33.4	XNW00521	black	42,0%	Toner	B/W	12.814
EPRT00088BMLUX	10.48.33.5	XNW00513	black	1,0%	Toner	B/W	41.796
EPRT00089BMLUX	10.48.33.6	XNW00511	black	17,0%	Toner	B/W	19.726
EPRT00090BMLUX	10.48.33.7	XNW00524	black	15,0%	Toner	B/W	24.951
EPRT00092BMLUX	10.48.33.9	XNW00570	black	13,0%	Toner	B/W	34.627
EPRT00094BMLUX	10.48.33.8	XNW00539	black	76,0%	Toner	B/W	1.827
EPRT00096BMLUX	10.48.33.13	XNW00553	black	36,0%	Toner	B/W	14.200
EPRT00097BMLUX	10.48.33.14	XNW00644	black	41,0%	Toner	B/W	12.898
EPRT00098BMLUX	10.48.33.15	XNW00587	black	35,0%	Toner	B/W	13.422
EPRT00099BMLUX	10.48.33.16	XNW00532	black	50,0%	Toner	B/W	7.785
EPRT00100BMLUX	10.48.33.17	XNW00542	black	13,0%	Toner	B/W	33.073
EPRT00101BMLUX	10.48.33.18	XNW00543	black	31,0%	Toner	B/W	15.932
EPRT00102BMLUX	10.48.161.6	XNW00545	black	12,0%	Toner	B/W	31.958
EPRT00103BMLUX	10.48.161.5	XNW00547	black	16,0%	Toner	B/W	18.831
EPRT00104BMLUX	10.48.161.11	XNW00544	black	16,0%	Toner	B/W	19.660
EPRT00105BMLUX	10.48.161.10	XNW00546	black	30,0%	Toner	B/W	18.707
EPRT00106BMLUX	10.48.161.13	XNW00627	black	24,0%	Toner	B/W	18.991
EPRT00107BMLUX	10.48.161.14	XNW00564	black	27,0%	Toner	B/W	17.894
EPRT00108BMLUX	10.48.161.4	XNW00561	black	52,0%	Toner	B/W	8.506
EPRT00109BMLUX	10.48.161.15	XNW00581	black	47,0%	Toner	B/W	9.886
EPRT00110BMLUX	10.48.161.12	XNW00537	black	50,0%	Toner	B/W	10.243
EPRT00111BMLUX	10.48.161.7	XNW00665	black	12,0%	Toner	B/W	24.383
EPRT00112BMLUX	10.48.161.3	XNW00666	black	63,0%	Toner	B/W	5.752
EPRT00113BMLUX	10.48.161.9	XNW00576	black	53,0%	Toner	B/W	5.364
EPRT00114BMLUX	10.48.161.8	XNW00582	black	52,0%	Toner	B/W	10.458
EPRT00115BMLUX	10.48.161.17	XNW00683	black	57,0%	Toner	B/W	7.738
EPRT00116BMLUX	10.48.161.2	XNW00592	black	50,0%	Toner	B/W	4.021
EPRT00117BMLUX	10.48.223.1	XNW00675	black	73,0%	Toner	B/W	4.575
EPRT00118CMLUX	10.48.33.19	XVC08108	black	5,0%	Toner	Color	68.519

EPRT00118CMLUX	10.48.33.19	XVC08108	cyan	43,0%	Toner	Color	68.519
EPRT00118CMLUX	10.48.33.19	XVC08108	magenta	44,0%	Toner	Color	68.519
EPRT00118CMLUX	10.48.33.19	XVC08108	yellow	45,0%	Toner	Color	68.519
EPRT00119CMLUX	10.48.33.20	XVC07958	black	0,0%	Toner	Color	73.360
EPRT00119CMLUX	10.48.33.20	XVC07958	black	78,0%	Toner	Color	87.672
EPRT00119CMLUX	10.48.33.20	XVC07958	cyan	5,0%	Toner	Color	87.672
EPRT00119CMLUX	10.48.33.20	XVC07958	magenta	20,0%	Toner	Color	87.672
EPRT00119CMLUX	10.48.33.20	XVC07958	yellow	17,0%	Toner	Color	87.672
EPRT00120CMLUX	10.48.33.21	XVC08091	black	5,0%	Toner	Color	77.710
EPRT00120CMLUX	10.48.33.21	XVC08091	cyan	47,0%	Toner	Color	77.710
EPRT00120CMLUX	10.48.33.21	XVC08091	magenta	45,0%	Toner	Color	77.710
EPRT00120CMLUX	10.48.33.21	XVC08091	yellow	36,0%	Toner	Color	77.710
EPRT00121CMLUX	10.48.33.22	XVC08220	black	14,0%	Toner	Color	59.773
EPRT00121CMLUX	10.48.33.22	XVC08220	cyan	54,0%	Toner	Color	59.773
EPRT00121CMLUX	10.48.33.22	XVC08220	magenta	54,0%	Toner	Color	59.773
EPRT00121CMLUX	10.48.33.22	XVC08220	yellow	46,0%	Toner	Color	59.773
EPRT00122CMLUX	10.48.33.23	XVC08096	black	92,0%	Toner	Color	5.511
EPRT00122CMLUX	10.48.33.23	XVC08096	cyan	96,0%	Toner	Color	5.511
EPRT00122CMLUX	10.48.33.23	XVC08096	magenta	95,0%	Toner	Color	5.511
EPRT00122CMLUX	10.48.33.23	XVC08096	yellow	96,0%	Toner	Color	5.511
EPRT00123CMLUX	10.48.33.24	XVC08219	black	37,0%	Toner	Color	45.268
EPRT00123CMLUX	10.48.33.24	XVC08219	cyan	67,0%	Toner	Color	45.268
EPRT00123CMLUX	10.48.33.24	XVC08219	magenta	64,0%	Toner	Color	45.268
EPRT00123CMLUX	10.48.33.24	XVC08219	yellow	59,0%	Toner	Color	45.268
EPRT00124CMLUX	10.48.33.25	XVC07962	black	17,0%	Toner	Color	64.570
EPRT00124CMLUX	10.48.33.25	XVC07962	cyan	43,0%	Toner	Color	64.570
EPRT00124CMLUX	10.48.33.25	XVC07962	magenta	50,0%	Toner	Color	64.570
EPRT00124CMLUX	10.48.33.25	XVC07962	yellow	47,0%	Toner	Color	64.570
EPRT00125CMLUX	10.48.33.26	XVC07959	black	5,0%	Toner	Color	66.595
EPRT00125CMLUX	10.48.33.26	XVC07959	cyan	31,0%	Toner	Color	66.595
EPRT00125CMLUX	10.48.33.26	XVC07959	magenta	44,0%	Toner	Color	66.595
EPRT00125CMLUX	10.48.33.26	XVC07959	yellow	51,0%	Toner	Color	66.595
EPRT00126CMLUX	10.48.161.1	XVC07981	black	61,0%	Toner	Color	24.736
EPRT00126CMLUX	10.48.161.1	XVC07981	cyan	82,0%	Toner	Color	24.736
EPRT00126CMLUX	10.48.161.1	XVC07981	magenta	84,0%	Toner	Color	24.736
EPRT00126CMLUX	10.48.161.1	XVC07981	yellow	83,0%	Toner	Color	24.736
EPRT00127CMLUX	10.48.161.16	XVC08095	black	74,0%	Toner	Color	17.229
EPRT00127CMLUX	10.48.161.16	XVC08095	cyan	78,0%	Toner	Color	17.229
EPRT00127CMLUX	10.48.161.16	XVC08095	magenta	83,0%	Toner	Color	17.229
EPRT00127CMLUX	10.48.161.16	XVC08095	yellow	81,0%	Toner	Color	17.229
EPRT00128BMSTR	10.56.33.1	XNW00606	black	13,0%	Toner	B/W	29.828
EPRT00129BMSTR	10.56.33.2	XNW00620	black	39,0%	Toner	B/W	15.437
EPRT00130BMSTR	10.57.33.1	XNW00674	black	55,0%	Toner	B/W	10.345
EPRT00131BMSTR	10.56.33.3	XNW00623	black	76,0%	Toner	B/W	2.641
EPRT00132BMSTR	10.56.161.1	XNW00617	black	56,0%	Toner	B/W	11.268

EPRT00133BMSTR	10.56.225.1	XNW00619	black	53,0%	Toner	B/W	13.639
EPRT00134BMSTR	10.56.225.2	XNW00601	black	24,0%	Toner	B/W	20.535
EPRT00135BMSTR	10.57.97.1	XNW00664	black	37,0%	Toner	B/W	11.826
EPRT00136BMSTR	10.57.97.2	XNW00662	black	53,0%	Toner	B/W	8.053
EPRT00137BMSTR	10.56.33.45	XNW00603	black	2,0%	Toner	B/W	41.826
EPRT00138BMSTR	10.56.97.2	XNW00608	black	45,0%	Toner	B/W	11.239
EPRT00139BMSTR	10.56.97.3	XNW00589	black	65,0%	Toner	B/W	5.420
EPRT00140BMSTR	10.56.97.4	XNW00598	black	73,0%	Toner	B/W	4.774
EPRT00142CMSTR	10.56.33.4	XVC07343	black	93,0%	Toner	Color	3.741
EPRT00142CMSTR	10.56.33.4	XVC07343	cyan	97,0%	Toner	Color	3.741
EPRT00142CMSTR	10.56.33.4	XVC07343	magenta	98,0%	Toner	Color	3.741
EPRT00142CMSTR	10.56.33.4	XVC07343	yellow	96,0%	Toner	Color	3.741
EPRT00143CMSTR	10.56.33.5	XVC07350	black	53,0%	Toner	Color	29.432
EPRT00143CMSTR	10.56.33.5	XVC07350	cyan	74,0%	Toner	Color	29.432
EPRT00143CMSTR	10.56.33.5	XVC07350	magenta	80,0%	Toner	Color	29.432
EPRT00143CMSTR	10.56.33.5	XVC07350	yellow	73,0%	Toner	Color	29.432
EPRT00144CMSTR	10.56.33.6	XVC07348	black	95,0%	Toner	Color	1.974
EPRT00144CMSTR	10.56.33.6	XVC07348	cyan	98,0%	Toner	Color	1.974
EPRT00144CMSTR	10.56.33.6	XVC07348	magenta	98,0%	Toner	Color	1.974
EPRT00144CMSTR	10.56.33.6	XVC07348	yellow	98,0%	Toner	Color	1.974
EPRT00145CMSTR	10.56.33.7	XVC07463	black	90,0%	Toner	Color	6.622
EPRT00145CMSTR	10.56.33.7	XVC07463	cyan	97,0%	Toner	Color	6.622
EPRT00145CMSTR	10.56.33.7	XVC07463	magenta	98,0%	Toner	Color	6.622
EPRT00145CMSTR	10.56.33.7	XVC07463	yellow	97,0%	Toner	Color	6.622
EPRT00146CMSTR	10.56.33.8	XVC07459	black	84,0%	Toner	Color	9.849
EPRT00146CMSTR	10.56.33.8	XVC07459	cyan	94,0%	Toner	Color	9.849
EPRT00146CMSTR	10.56.33.8	XVC07459	magenta	96,0%	Toner	Color	9.849
EPRT00146CMSTR	10.56.33.8	XVC07459	yellow	93,0%	Toner	Color	9.849
EPRT00147CMSTR	10.56.33.9	XVC07647	black	92,0%	Toner	Color	5.400
EPRT00147CMSTR	10.56.33.9	XVC07647	cyan	98,0%	Toner	Color	5.400
EPRT00147CMSTR	10.56.33.9	XVC07647	magenta	98,0%	Toner	Color	5.400
EPRT00147CMSTR	10.56.33.9	XVC07647	yellow	98,0%	Toner	Color	5.400
EPRT00148CMSTR	10.56.33.10	XVC07657	black	38,0%	Toner	Color	31.999
EPRT00148CMSTR	10.56.33.10	XVC07657	cyan	79,0%	Toner	Color	31.999
EPRT00148CMSTR	10.56.33.10	XVC07657	magenta	83,0%	Toner	Color	31.999
EPRT00148CMSTR	10.56.33.10	XVC07657	yellow	74,0%	Toner	Color	31.999
EPRT00149CMSTR	10.56.33.11	XVC07544	black	79,0%	Toner	Color	17.524
EPRT00149CMSTR	10.56.33.11	XVC07544	cyan	95,0%	Toner	Color	17.524
EPRT00149CMSTR	10.56.33.11	XVC07544	magenta	96,0%	Toner	Color	17.524
EPRT00149CMSTR	10.56.33.11	XVC07544	yellow	94,0%	Toner	Color	17.524
EPRT00150CMSTR	10.56.33.12	XVC07545	black	82,0%	Toner	Color	10.368
EPRT00150CMSTR	10.56.33.12	XVC07545	cyan	92,0%	Toner	Color	10.368
EPRT00150CMSTR	10.56.33.12	XVC07545	magenta	91,0%	Toner	Color	10.368
EPRT00150CMSTR	10.56.33.12	XVC07545	yellow	90,0%	Toner	Color	10.368
EPRT00151CMSTR	10.56.33.13	XVC07429	black	93,0%	Toner	Color	4.819

EPRT00151CMSTR	10.56.33.13	XVC07429	cyan	97,0%	Toner	Color	4.819
EPRT00151CMSTR	10.56.33.13	XVC07429	magenta	97,0%	Toner	Color	4.819
EPRT00151CMSTR	10.56.33.13	XVC07429	yellow	96,0%	Toner	Color	4.819
EPRT00152CMSTR	10.56.97.10	XVC07608	black	0,0%	Toner	Color	54.463
EPRT00152CMSTR	10.56.97.10	XVC07608	black	82,0%	Toner	Color	63.235
EPRT00152CMSTR	10.56.97.10	XVC07608	cyan	44,0%	Toner	Color	63.235
EPRT00152CMSTR	10.56.97.10	XVC07608	magenta	43,0%	Toner	Color	63.235
EPRT00152CMSTR	10.56.97.10	XVC07608	yellow	43,0%	Toner	Color	63.235
EPRT00153CMSTR	10.57.97.3	XVC07616	black	5,0%	Toner	Color	62.794
EPRT00153CMSTR	10.57.97.3	XVC07616	black	62,0%	Toner	Color	88.861
EPRT00153CMSTR	10.57.97.3	XVC07616	cyan	23,0%	Toner	Color	88.861
EPRT00153CMSTR	10.57.97.3	XVC07616	magenta	21,0%	Toner	Color	88.861
EPRT00153CMSTR	10.57.97.3	XVC07616	yellow	16,0%	Toner	Color	88.861
EPRT00154CMSTR	10.57.97.4	XVC07606	black	62,0%	Toner	Color	24.650
EPRT00154CMSTR	10.57.97.4	XVC07606	cyan	83,0%	Toner	Color	24.650
EPRT00154CMSTR	10.57.97.4	XVC07606	magenta	85,0%	Toner	Color	24.650
EPRT00154CMSTR	10.57.97.4	XVC07606	yellow	84,0%	Toner	Color	24.650
EPRT00155CMSTR	10.57.97.5	XVC07521	black	69,0%	Toner	Color	19.404
EPRT00155CMSTR	10.57.97.5	XVC07521	cyan	83,0%	Toner	Color	19.404
EPRT00155CMSTR	10.57.97.5	XVC07521	magenta	82,0%	Toner	Color	19.404
EPRT00155CMSTR	10.57.97.5	XVC07521	yellow	80,0%	Toner	Color	19.404
EPRT00156CMSTR	10.56.33.46	XVC07615	black	62,0%	Toner	Color	20.536
EPRT00156CMSTR	10.56.33.46	XVC07615	cyan	85,0%	Toner	Color	20.536
EPRT00156CMSTR	10.56.33.46	XVC07615	magenta	86,0%	Toner	Color	20.536
EPRT00156CMSTR	10.56.33.46	XVC07615	yellow	82,0%	Toner	Color	20.536
EPRT00157CMSTR	10.56.97.7	XVC07522	black	45,0%	Toner	Color	30.227
EPRT00157CMSTR	10.56.97.7	XVC07522	cyan	76,0%	Toner	Color	30.227
EPRT00157CMSTR	10.56.97.7	XVC07522	magenta	74,0%	Toner	Color	30.227
EPRT00157CMSTR	10.56.97.7	XVC07522	yellow	70,0%	Toner	Color	30.227
EPRT00158CMSTR	10.56.97.8	XVC07609	black	91,0%	Toner	Color	5.949
EPRT00158CMSTR	10.56.97.8	XVC07609	cyan	94,0%	Toner	Color	5.949
EPRT00158CMSTR	10.56.97.8	XVC07609	magenta	96,0%	Toner	Color	5.949
EPRT00158CMSTR	10.56.97.8	XVC07609	yellow	95,0%	Toner	Color	5.949
EPRT00159CMSTR	10.56.97.9	XVC07605	black	75,0%	Toner	Color	15.661
EPRT00159CMSTR	10.56.97.9	XVC07605	cyan	91,0%	Toner	Color	15.661
EPRT00159CMSTR	10.56.97.9	XVC07605	magenta	91,0%	Toner	Color	15.661
EPRT00159CMSTR	10.56.97.9	XVC07605	yellow	89,0%	Toner	Color	15.661
EPRT00160BMBRU	10.52.33.10	XNW01005	black	5,0%	Toner	B/W	36.975
EPRT00160BMBRU	10.52.33.10	XNW01005	black	66,0%	Toner	B/W	52.866
EPRT00161CMBRU	10.52.33.11	XVC11716	black	69,0%	Toner	Color	25.294
EPRT00161CMBRU	10.52.33.11	XVC11716	cyan	80,0%	Toner	Color	25.294
EPRT00161CMBRU	10.52.33.11	XVC11716	magenta	81,0%	Toner	Color	25.294
EPRT00161CMBRU	10.52.33.11	XVC11716	yellow	80,0%	Toner	Color	25.294
EPRT00162BMBRU	10.53.161.15	XNW01012	black	57,0%	Toner	B/W	3.432
EPRT00163CMBRU	10.52.33.12	XVC11317	black	57,0%	Toner	Color	36.875

EPRT00163CMBRU	10.52.33.12	XVC11317	cyan	71,0%	Toner	Color	36.875
EPRT00163CMBRU	10.52.33.12	XVC11317	magenta	74,0%	Toner	Color	36.875
EPRT00163CMBRU	10.52.33.12	XVC11317	yellow	74,0%	Toner	Color	36.875
EPRT00164CMBRU	10.52.225.4	XVC11318	black	75,0%	Toner	Color	22.481
EPRT00164CMBRU	10.52.225.4	XVC11318	cyan	91,0%	Toner	Color	22.481
EPRT00164CMBRU	10.52.225.4	XVC11318	magenta	90,0%	Toner	Color	22.481
EPRT00164CMBRU	10.52.225.4	XVC11318	yellow	90,0%	Toner	Color	22.481
EPRT00165BMBRU	10.54.33.1	XNW01004	black	44,0%	Toner	B/W	9.882
EPRT00166BMBRU	10.52.161.11	XNW00998	black	67,0%	Toner	B/W	2.373
EPRT00167BMBRU	10.52.161.12	XNW00988	black	39,0%	Toner	B/W	8.608
EPRT00168CMBRU	10.52.161.13	XVC11726	black	98,0%	Toner	Color	1.084
EPRT00168CMBRU	10.52.161.13	XVC11726	cyan	98,0%	Toner	Color	1.084
EPRT00168CMBRU	10.52.161.13	XVC11726	magenta	98,0%	Toner	Color	1.084
EPRT00168CMBRU	10.52.161.13	XVC11726	yellow	98,0%	Toner	Color	1.084
EPRT00169BMBRU	10.52.161.14	XNW01210	black	60,0%	Toner	B/W	6.000
EPRT00170CMBRU	10.52.161.15	XVC11719	black	37,0%	Toner	Color	42.755
EPRT00170CMBRU	10.52.161.15	XVC11719	cyan	46,0%	Toner	Color	42.755
EPRT00170CMBRU	10.52.161.15	XVC11719	magenta	58,0%	Toner	Color	42.755
EPRT00170CMBRU	10.52.161.15	XVC11719	yellow	54,0%	Toner	Color	42.755
EPRT00171CMBRU	10.52.161.16	XVC11731	black	92,0%	Toner	Color	6.763
EPRT00171CMBRU	10.52.161.16	XVC11731	cyan	94,0%	Toner	Color	6.763
EPRT00171CMBRU	10.52.161.16	XVC11731	magenta	94,0%	Toner	Color	6.763
EPRT00171CMBRU	10.52.161.16	XVC11731	yellow	92,0%	Toner	Color	6.763
EPRT00172BMBRU	10.52.161.17	XNW01014	black	34,0%	Toner	B/W	11.507
EPRT00173BMBRU	10.52.161.18	XNW01010	black	49,0%	Toner	B/W	6.803
EPRT00174BMBRU	10.52.161.19	XNW01071	black	60,0%	Toner	B/W	4.121
EPRT00175CMBRU	10.52.161.20	XVC11717	black	83,0%	Toner	Color	14.118
EPRT00175CMBRU	10.52.161.20	XVC11717	cyan	88,0%	Toner	Color	14.118
EPRT00175CMBRU	10.52.161.20	XVC11717	magenta	89,0%	Toner	Color	14.118
EPRT00175CMBRU	10.52.161.20	XVC11717	yellow	89,0%	Toner	Color	14.118
EPRT00176BMBRU	10.52.33.13	XNW01006	black	61,0%	Toner	B/W	4.329
EPRT00177BMBRU	10.52.33.24	XNW01043	black	36,0%	Toner	B/W	9.908
EPRT00178BMBRU	10.52.33.25	XNW00982	black	41,0%	Toner	B/W	4.030
EPRT00179CMBRU	10.52.225.1	XVC11985	black	60,0%	Toner	Color	30.782
EPRT00179CMBRU	10.52.225.1	XVC11985	cyan	81,0%	Toner	Color	30.782
EPRT00179CMBRU	10.52.225.1	XVC11985	magenta	80,0%	Toner	Color	30.782
EPRT00179CMBRU	10.52.225.1	XVC11985	yellow	79,0%	Toner	Color	30.782
EPRT00180BMBRU	10.52.225.2	XNW01197	black	68,0%	Toner	B/W	2.953
EPRT00181BMBRU	10.52.225.3	XNW01145	black	48,0%	Toner	B/W	8.229
EPRT00182BMBRU	10.55.33.1	XNW01152	black	9,0%	Toner	B/W	29.990
EPRT00183BMBRU	10.53.161.4	XNW01129	black	68,0%	Toner	B/W	2.725
EPRT00184BMBRU	10.54.225.10	XNW01059	black	41,0%	Toner	B/W	11.183
EPRT00185BMBRU	10.54.225.11	XNW01167	black	12,0%	Toner	B/W	33.372
EPRT00186CMBRU	10.54.225.12	XVC11700	black	45,0%	Toner	Color	40.214
EPRT00186CMBRU	10.54.225.12	XVC11700	cyan	67,0%	Toner	Color	40.214

EPRT00186CMBRU	10.54.225.12	XVC11700	magenta	69,0%	Toner	Color	40.214
EPRT00186CMBRU	10.54.225.12	XVC11700	yellow	67,0%	Toner	Color	40.214
EPRT00187BMBRU	10.54.225.13	XNW01055	black	15,0%	Toner	B/W	27.598
EPRT00188BMBRU	10.54.225.14	XNW01065	black	15,0%	Toner	B/W	18.309
EPRT00189CMBRU	10.54.225.15	XVC11839	black	85,0%	Toner	Color	11.048
EPRT00189CMBRU	10.54.225.15	XVC11839	cyan	92,0%	Toner	Color	11.048
EPRT00189CMBRU	10.54.225.15	XVC11839	magenta	93,0%	Toner	Color	11.048
EPRT00189CMBRU	10.54.225.15	XVC11839	yellow	92,0%	Toner	Color	11.048
EPRT00190BMBRU	10.54.225.16	XNW01057	black	15,0%	Toner	B/W	16.766
EPRT00191CMBRU	10.54.225.17	XVC11883	black	74,0%	Toner	Color	21.127
EPRT00191CMBRU	10.54.225.17	XVC11883	cyan	84,0%	Toner	Color	21.127
EPRT00191CMBRU	10.54.225.17	XVC11883	magenta	86,0%	Toner	Color	21.127
EPRT00191CMBRU	10.54.225.17	XVC11883	yellow	80,0%	Toner	Color	21.127
EPRT00192CMBRU	10.54.225.18	XVC11705	black	67,0%	Toner	Color	26.741
EPRT00192CMBRU	10.54.225.18	XVC11705	cyan	69,0%	Toner	Color	26.741
EPRT00192CMBRU	10.54.225.18	XVC11705	magenta	73,0%	Toner	Color	26.741
EPRT00192CMBRU	10.54.225.18	XVC11705	yellow	73,0%	Toner	Color	26.741
EPRT00193BMBRU	10.54.225.19	XNW01118	black	46,0%	Toner	B/W	12.007
EPRT00194BMBRU	10.54.225.20	XNW01102	black	4,0%	Toner	B/W	50.685
EPRT00194BMBRU	10.54.225.20	XNW01102	black	95,0%	Toner	B/W	51.847
EPRT00195BMBRU	10.54.225.21	XNW01060	black	7,0%	Toner	B/W	39.062
EPRT00196BMBRU	10.54.225.22	XNW01114	black	80,0%	Toner	B/W	8.901
EPRT00197BMBRU	10.54.225.23	XNW01064	black	15,0%	Toner	B/W	20.089
EPRT00198BMBRU	10.54.225.24	XNW01171	black	35,0%	Toner	B/W	14.377
EPRT00199CMBRU	10.54.225.25	XVC11613	black	36,0%	Toner	Color	54.520
EPRT00199CMBRU	10.54.225.25	XVC11613	cyan	46,0%	Toner	Color	54.520
EPRT00199CMBRU	10.54.225.25	XVC11613	magenta	63,0%	Toner	Color	54.520
EPRT00199CMBRU	10.54.225.25	XVC11613	yellow	62,0%	Toner	Color	54.520
EPRT00200CMBRU	10.54.225.26	XVC11653	black	52,0%	Toner	Color	34.043
EPRT00200CMBRU	10.54.225.26	XVC11653	cyan	69,0%	Toner	Color	34.043
EPRT00200CMBRU	10.54.225.26	XVC11653	magenta	75,0%	Toner	Color	34.043
EPRT00200CMBRU	10.54.225.26	XVC11653	yellow	67,0%	Toner	Color	34.043
EPRT00201CMBRU	10.54.225.27	XVC11546	black	60,0%	Toner	Color	33.334
EPRT00201CMBRU	10.54.225.27	XVC11546	cyan	79,0%	Toner	Color	33.334
EPRT00201CMBRU	10.54.225.27	XVC11546	magenta	76,0%	Toner	Color	33.334
EPRT00201CMBRU	10.54.225.27	XVC11546	yellow	73,0%	Toner	Color	33.334
EPRT00202BMBRU	10.54.225.28	XNW01080	black	20,0%	Toner	B/W	17.187
EPRT00203CMBRU	10.53.33.161	XVC11953	black	58,0%	Toner	Color	28.692
EPRT00203CMBRU	10.53.33.161	XVC11953	cyan	71,0%	Toner	Color	28.692
EPRT00203CMBRU	10.53.33.161	XVC11953	magenta	71,0%	Toner	Color	28.692
EPRT00203CMBRU	10.53.33.161	XVC11953	yellow	71,0%	Toner	Color	28.692
EPRT00204BMBRU	10.53.33.162	XNW01096	black	16,0%	Toner	B/W	22.651
EPRT00205BMBRU	10.55.33.7	XNW01208	black	44,0%	Toner	B/W	10.745
EPRT00206BMBRU	10.55.33.4	XNW01203	black	75,0%	Toner	B/W	1.902
EPRT00207CMBRU	10.55.33.6	XVC12108	black	69,0%	Toner	Color	28.738

EPRT00207CMBRU	10.55.33.6	XVC12108	cyan	71,0%	Toner	Color	28.738
EPRT00207CMBRU	10.55.33.6	XVC12108	magenta	78,0%	Toner	Color	28.738
EPRT00207CMBRU	10.55.33.6	XVC12108	yellow	72,0%	Toner	Color	28.738
EPRT00208BMBRU	10.52.97.5	XNW01144	black	14,0%	Toner	B/W	25.378
EPRT00209BMBRU	10.54.225.31	XNW01132	black	23,0%	Toner	B/W	14.918
EPRT00210BMBRU	10.52.97.7	XNW01199	black	68,0%	Toner	B/W	5.180
EPRT00211BMBRU	10.52.97.8	XNW01205	black	28,0%	Toner	B/W	12.105
EPRT00212BMBRU	10.52.97.9	XNW01088	black	36,0%	Toner	B/W	14.661
EPRT00213BMBRU	10.53.33.69	XNW01113	black	83,0%	Toner	B/W	3.860
EPRT00214BMBRU	10.52.97.11	XNW01111	black	34,0%	Toner	B/W	11.124
EPRT00216CMBRU	10.53.161.12	XVC11761	black	60,0%	Toner	Color	37.277
EPRT00216CMBRU	10.53.161.12	XVC11761	cyan	67,0%	Toner	Color	37.277
EPRT00216CMBRU	10.53.161.12	XVC11761	magenta	78,0%	Toner	Color	37.277
EPRT00216CMBRU	10.53.161.12	XVC11761	yellow	62,0%	Toner	Color	37.277
EPRT00217BMBRU	10.52.97.14	XNW01084	black	2,0%	Toner	B/W	50.801
EPRT00218BMBRU	10.52.97.15	XNW01085	black	33,0%	Toner	B/W	15.605
EPRT00219BMBRU	10.52.97.16	XNW01095	black	14,0%	Toner	B/W	24.808
EPRT00220CMBRU	10.52.97.17	XVC12003	black	62,0%	Toner	Color	27.443
EPRT00220CMBRU	10.52.97.17	XVC12003	cyan	69,0%	Toner	Color	27.443
EPRT00220CMBRU	10.52.97.17	XVC12003	magenta	76,0%	Toner	Color	27.443
EPRT00220CMBRU	10.52.97.17	XVC12003	yellow	72,0%	Toner	Color	27.443
EPRT00221BMBRU	10.52.97.18	XNW01106	black	30,0%	Toner	B/W	14.834
EPRT00222BMBRU	10.52.97.19	XNW01079	black	35,0%	Toner	B/W	12.561
EPRT00223CMBRU	10.52.97.20	XVC12126	black	81,0%	Toner	Color	16.209
EPRT00223CMBRU	10.52.97.20	XVC12126	cyan	85,0%	Toner	Color	16.209
EPRT00223CMBRU	10.52.97.20	XVC12126	magenta	89,0%	Toner	Color	16.209
EPRT00223CMBRU	10.52.97.20	XVC12126	yellow	89,0%	Toner	Color	16.209
EPRT00224BMBRU	10.55.33.3	XNW01146	black	77,0%	Toner	B/W	333
EPRT00225CMBRU	10.122.13.90	XVC12128	black	83,0%	Toner	Color	10.872
EPRT00225CMBRU	10.122.13.90	XVC12128	cyan	73,0%	Toner	Color	10.872
EPRT00225CMBRU	10.122.13.90	XVC12128	magenta	86,0%	Toner	Color	10.872
EPRT00225CMBRU	10.122.13.90	XVC12128	yellow	91,0%	Toner	Color	10.872
EPRT00226BMBRU	10.52.97.10	XNW01186	black	76,0%	Toner	B/W	384
EPRT00227BMBRU	10.52.97.24	XNW01097	black	44,0%	Toner	B/W	5.454
EPRT00228CMBRU	10.52.97.25	XVC12007	black	67,0%	Toner	Color	27.396
EPRT00228CMBRU	10.52.97.25	XVC12007	cyan	60,0%	Toner	Color	27.396
EPRT00228CMBRU	10.52.97.25	XVC12007	magenta	71,0%	Toner	Color	27.396
EPRT00228CMBRU	10.52.97.25	XVC12007	yellow	47,0%	Toner	Color	27.396
EPRT00229BMBRU	10.52.97.26	XNW01109	black	13,0%	Toner	B/W	18.069
EPRT00230BMBRU	10.52.97.27	XNW01180	black	68,0%	Toner	B/W	2.038
EPRT00231BMBRU	10.52.97.28	XNW01191	black	66,0%	Toner	B/W	14.518
EPRT00232CMBRU	10.52.97.29	XVC12100	black	49,0%	Toner	Color	33.997
EPRT00232CMBRU	10.52.97.29	XVC12100	cyan	65,0%	Toner	Color	33.997
EPRT00232CMBRU	10.52.97.29	XVC12100	magenta	76,0%	Toner	Color	33.997
EPRT00232CMBRU	10.52.97.29	XVC12100	yellow	77,0%	Toner	Color	33.997



EPRT00233BMBRU	10.52.97.30	XNW01155	black	15,0%	Toner	B/W	16.161
EPRT00234BMBRU	10.52.97.31	XNW01165	black	26,0%	Toner	B/W	13.380
EPRT00235CMBRU	10.53.161.11	XVC11979	black	81,0%	Toner	Color	17.888
EPRT00235CMBRU	10.53.161.11	XVC11979	cyan	84,0%	Toner	Color	17.888
EPRT00235CMBRU	10.53.161.11	XVC11979	magenta	86,0%	Toner	Color	17.888
EPRT00235CMBRU	10.53.161.11	XVC11979	yellow	87,0%	Toner	Color	17.888
EPRT00236BMBRU	10.53.225.18	XNW01046	black	50,0%	Toner	B/W	8.545
EPRT00237BMBRU	10.53.225.19	XNW01143	black	42,0%	Toner	B/W	10.322
EPRT00238BMBRU	10.53.225.20	XNW01128	black	3,0%	Toner	B/W	39.037
EPRT00239BMBRU	10.53.225.21	XNW00999	black	32,0%	Toner	B/W	16.890
EPRT00240CMBRU	10.53.225.22	XVC11805	black	0,0%	Toner	Color	82.886
EPRT00240CMBRU	10.53.225.22	XVC11805	black	69,0%	Toner	Color	105.835
EPRT00240CMBRU	10.53.225.22	XVC11805	cyan	18,0%	Toner	Color	105.835
EPRT00240CMBRU	10.53.225.22	XVC11805	magenta	32,0%	Toner	Color	105.835
EPRT00240CMBRU	10.53.225.22	XVC11805	yellow	16,0%	Toner	Color	105.835
EPRT00241BMBRU	10.53.225.23	XNW01044	black	71,0%	Toner	B/W	4.106
EPRT00242BMBRU	10.53.225.24	XNW01035	black	6,0%	Toner	B/W	33.577
EPRT00243BMBRU	10.53.225.25	XNW01008	black	13,0%	Toner	B/W	24.992
EPRT00244BMBRU	10.53.225.26	XNW01000	black	11,0%	Toner	B/W	33.975
EPRT00245CMBRU	10.53.225.27	XVC11813	black	0,0%	Toner	Color	64.664
EPRT00245CMBRU	10.53.225.27	XVC11813	black	90,0%	Toner	Color	69.744
EPRT00245CMBRU	10.53.225.27	XVC11813	cyan	39,0%	Toner	Color	69.744
EPRT00245CMBRU	10.53.225.27	XVC11813	magenta	49,0%	Toner	Color	69.744
EPRT00245CMBRU	10.53.225.27	XVC11813	yellow	38,0%	Toner	Color	69.744
EPRT00246CMBRU	10.53.225.28	XVC11811	black	0,0%	Toner	Color	77.337
EPRT00246CMBRU	10.53.225.28	XVC11811	black	73,0%	Toner	Color	95.913
EPRT00246CMBRU	10.53.225.28	XVC11811	cyan	27,0%	Toner	Color	95.913
EPRT00246CMBRU	10.53.225.28	XVC11811	magenta	29,0%	Toner	Color	95.913
EPRT00246CMBRU	10.53.225.28	XVC11811	yellow	21,0%	Toner	Color	95.913
EPRT00247BMBRU	10.53.225.29	XNW01053	black	15,0%	Toner	B/W	23.767
EPRT00248BMBRU	10.53.225.30	XNW01070	black	52,0%	Toner	B/W	11.018
EPRT00249BMBRU	10.53.225.31	XNW01086	black	26,0%	Toner	B/W	15.767
EPRT00250CMBRU	10.53.225.32	XVC11804	black	26,0%	Toner	Color	62.049
EPRT00250CMBRU	10.53.225.32	XVC11804	cyan	36,0%	Toner	Color	62.049
EPRT00250CMBRU	10.53.225.32	XVC11804	magenta	53,0%	Toner	Color	62.049
EPRT00250CMBRU	10.53.225.32	XVC11804	yellow	42,0%	Toner	Color	62.049
EPRT00251CMBRU	10.53.225.33	XVC11712	black	62,0%	Toner	Color	31.986
EPRT00251CMBRU	10.53.225.33	XVC11712	cyan	61,0%	Toner	Color	31.986
EPRT00251CMBRU	10.53.225.33	XVC11712	magenta	67,0%	Toner	Color	31.986
EPRT00251CMBRU	10.53.225.33	XVC11712	yellow	62,0%	Toner	Color	31.986
EPRT00252BMBRU	10.53.225.34	XNW01029	black	14,0%	Toner	B/W	29.120
EPRT00253CMBRU	10.53.225.35	XVC11614	black	5,0%	Toner	Color	85.169
EPRT00253CMBRU	10.53.225.35	XVC11614	black	55,0%	Toner	Color	117.598
EPRT00253CMBRU	10.53.225.35	XVC11614	cyan	5,0%	Toner	Color	117.598
EPRT00253CMBRU	10.53.225.35	XVC11614	magenta	16,0%	Toner	Color	117.598

EPRT00253CMBRU	10.53.225.35	XVC11614	yellow	5,0%	Toner	Color	117.598
EPRT00254BMBRU	10.53.225.36	XNW01058	black	5,0%	Toner	B/W	50.358
EPRT00254BMBRU	10.53.225.36	XNW01058	black	91,0%	Toner	B/W	53.644
EPRT00255BMBRU	10.53.225.37	XNW01056	black	6,0%	Toner	B/W	37.906
EPRT00256BMBRU	10.53.225.38	XNW01054	black	73,0%	Toner	B/W	1.679
EPRT00257CMBRU	10.53.225.39	XVC11720	black	5,0%	Toner	Color	75.513
EPRT00257CMBRU	10.53.225.39	XVC11720	cyan	40,0%	Toner	Color	75.513
EPRT00257CMBRU	10.53.225.39	XVC11720	magenta	46,0%	Toner	Color	75.513
EPRT00257CMBRU	10.53.225.39	XVC11720	yellow	36,0%	Toner	Color	75.513
EPRT00258CMBRU	10.54.97.1	XVC11362	black	97,0%	Toner	Color	1.601
EPRT00258CMBRU	10.54.97.1	XVC11362	cyan	98,0%	Toner	Color	1.601
EPRT00258CMBRU	10.54.97.1	XVC11362	magenta	98,0%	Toner	Color	1.601
EPRT00258CMBRU	10.54.97.1	XVC11362	yellow	98,0%	Toner	Color	1.601
EPRT00259CMBRU	10.54.97.2	XVC11402	black	56,0%	Toner	Color	24.083
EPRT00259CMBRU	10.54.97.2	XVC11402	cyan	79,0%	Toner	Color	24.083
EPRT00259CMBRU	10.54.97.2	XVC11402	magenta	81,0%	Toner	Color	24.083
EPRT00259CMBRU	10.54.97.2	XVC11402	yellow	81,0%	Toner	Color	24.083
EPRT00260CMBRU	10.52.33.27	XVC11388	black	83,0%	Toner	Color	12.545
EPRT00260CMBRU	10.52.33.27	XVC11388	cyan	91,0%	Toner	Color	12.545
EPRT00260CMBRU	10.52.33.27	XVC11388	magenta	91,0%	Toner	Color	12.545
EPRT00260CMBRU	10.52.33.27	XVC11388	yellow	90,0%	Toner	Color	12.545
EPRT00261CMBRU	10.54.97.4	XVC11415	black	87,0%	Toner	Color	9.660
EPRT00261CMBRU	10.54.97.4	XVC11415	cyan	88,0%	Toner	Color	9.660
EPRT00261CMBRU	10.54.97.4	XVC11415	magenta	91,0%	Toner	Color	9.660
EPRT00261CMBRU	10.54.97.4	XVC11415	yellow	93,0%	Toner	Color	9.660
EPRT00262BMBRU	10.53.161.5	XNW01083	black	15,0%	Toner	B/W	20.446
EPRT00263CMBRU	10.52.33.26	XVC11728	black	82,0%	Toner	Color	14.579
EPRT00263CMBRU	10.52.33.26	XVC11728	cyan	90,0%	Toner	Color	14.579
EPRT00263CMBRU	10.52.33.26	XVC11728	magenta	92,0%	Toner	Color	14.579
EPRT00263CMBRU	10.52.33.26	XVC11728	yellow	88,0%	Toner	Color	14.579
EPRT00264CMBRU	10.52.161.23	XVC11433	black	31,0%	Toner	Color	30.871
EPRT00264CMBRU	10.52.161.23	XVC11433	cyan	78,0%	Toner	Color	30.871
EPRT00264CMBRU	10.52.161.23	XVC11433	magenta	84,0%	Toner	Color	30.871
EPRT00264CMBRU	10.52.161.23	XVC11433	yellow	81,0%	Toner	Color	30.871
EPRT00265CMBRU	10.52.161.24	XVC11500	black	59,0%	Toner	Color	27.684
EPRT00265CMBRU	10.52.161.24	XVC11500	cyan	83,0%	Toner	Color	27.684
EPRT00265CMBRU	10.52.161.24	XVC11500	magenta	86,0%	Toner	Color	27.684
EPRT00265CMBRU	10.52.161.24	XVC11500	yellow	84,0%	Toner	Color	27.684
EPRT00266CMBRU	10.52.161.25	XVC11634	black	85,0%	Toner	Color	9.723
EPRT00266CMBRU	10.52.161.25	XVC11634	cyan	92,0%	Toner	Color	9.723
EPRT00266CMBRU	10.52.161.25	XVC11634	magenta	94,0%	Toner	Color	9.723
EPRT00266CMBRU	10.52.161.25	XVC11634	yellow	93,0%	Toner	Color	9.723
EPRT00267CMBRU	10.52.161.26	XVC11418	black	52,0%	Toner	Color	35.321
EPRT00267CMBRU	10.52.161.26	XVC11418	cyan	77,0%	Toner	Color	35.321
EPRT00267CMBRU	10.52.161.26	XVC11418	magenta	80,0%	Toner	Color	35.321

EPRT00267CMBRU	10.52.161.26	XVC11418	yellow	73,0%	Toner	Color	35.321
EPRT00268CMBRU	10.53.33.194	XVC11640	black	82,0%	Toner	Color	8.627
EPRT00268CMBRU	10.53.33.194	XVC11640	cyan	94,0%	Toner	Color	8.627
EPRT00268CMBRU	10.53.33.194	XVC11640	magenta	94,0%	Toner	Color	8.627
EPRT00268CMBRU	10.53.33.194	XVC11640	yellow	95,0%	Toner	Color	8.627
EPRT00270CMBRU	10.52.161.21	XVC11416	black	81,0%	Toner	Color	11.450
EPRT00270CMBRU	10.52.161.21	XVC11416	cyan	94,0%	Toner	Color	11.450
EPRT00270CMBRU	10.52.161.21	XVC11416	magenta	93,0%	Toner	Color	11.450
EPRT00270CMBRU	10.52.161.21	XVC11416	yellow	92,0%	Toner	Color	11.450
EPRT00271CMBRU	10.52.161.22	XVC11419	black	60,0%	Toner	Color	28.754
EPRT00271CMBRU	10.52.161.22	XVC11419	cyan	78,0%	Toner	Color	28.754
EPRT00271CMBRU	10.52.161.22	XVC11419	magenta	82,0%	Toner	Color	28.754
EPRT00271CMBRU	10.52.161.22	XVC11419	yellow	75,0%	Toner	Color	28.754
EPRT00272CMBRU	10.53.161.6	XVC11773	black	99,0%	Toner	Color	31
EPRT00272CMBRU	10.53.161.6	XVC11773	cyan	99,0%	Toner	Color	31
EPRT00272CMBRU	10.53.161.6	XVC11773	magenta	99,0%	Toner	Color	31
EPRT00272CMBRU	10.53.161.6	XVC11773	yellow	99,0%	Toner	Color	31
EPRT00273CMBRU	10.53.161.7	XVC11945	black	92,0%	Toner	Color	2.820
EPRT00273CMBRU	10.53.161.7	XVC11945	cyan	96,0%	Toner	Color	2.820
EPRT00273CMBRU	10.53.161.7	XVC11945	magenta	96,0%	Toner	Color	2.820
EPRT00273CMBRU	10.53.161.7	XVC11945	yellow	95,0%	Toner	Color	2.820
EPRT00274CMBRU	10.53.161.8	XVC11949	black	85,0%	Toner	Color	9.515
EPRT00274CMBRU	10.53.161.8	XVC11949	cyan	91,0%	Toner	Color	9.515
EPRT00274CMBRU	10.53.161.8	XVC11949	magenta	91,0%	Toner	Color	9.515
EPRT00274CMBRU	10.53.161.8	XVC11949	yellow	92,0%	Toner	Color	9.515
EPRT00275CMBRU	10.53.161.9	XVC11954	black	98,0%	Toner	Color	486
EPRT00275CMBRU	10.53.161.9	XVC11954	cyan	99,0%	Toner	Color	486
EPRT00275CMBRU	10.53.161.9	XVC11954	magenta	99,0%	Toner	Color	486
EPRT00275CMBRU	10.53.161.9	XVC11954	yellow	99,0%	Toner	Color	486
EPRT00276CMBRU	10.53.161.10	XVC11948	black	98,0%	Toner	Color	962
EPRT00276CMBRU	10.53.161.10	XVC11948	cyan	99,0%	Toner	Color	962
EPRT00276CMBRU	10.53.161.10	XVC11948	magenta	99,0%	Toner	Color	962
EPRT00276CMBRU	10.53.161.10	XVC11948	yellow	99,0%	Toner	Color	962
EPRT00277CMBRU	10.53.33.34	XVC11808	black	56,0%	Toner	Color	36.542
EPRT00277CMBRU	10.53.33.34	XVC11808	cyan	73,0%	Toner	Color	36.542
EPRT00277CMBRU	10.53.33.34	XVC11808	magenta	76,0%	Toner	Color	36.542
EPRT00277CMBRU	10.53.33.34	XVC11808	yellow	76,0%	Toner	Color	36.542
EPRT00278CMBRU	10.53.33.35	XVC11593	black	15,0%	Toner	Color	68.862
EPRT00278CMBRU	10.53.33.35	XVC11593	cyan	55,0%	Toner	Color	68.862
EPRT00278CMBRU	10.53.33.35	XVC11593	magenta	57,0%	Toner	Color	68.862
EPRT00278CMBRU	10.53.33.35	XVC11593	yellow	59,0%	Toner	Color	68.862
EPRT00279CMBRU	10.53.33.36	XVC11842	black	27,0%	Toner	Color	63.422
EPRT00279CMBRU	10.53.33.36	XVC11842	cyan	64,0%	Toner	Color	63.422
EPRT00279CMBRU	10.53.33.36	XVC11842	magenta	67,0%	Toner	Color	63.422
EPRT00279CMBRU	10.53.33.36	XVC11842	yellow	68,0%	Toner	Color	63.422

EPRT00280CMBRU	10.53.33.37	XVC11852	black	69,0%	Toner	Color	25.393
EPRT00280CMBRU	10.53.33.37	XVC11852	cyan	80,0%	Toner	Color	25.393
EPRT00280CMBRU	10.53.33.37	XVC11852	magenta	83,0%	Toner	Color	25.393
EPRT00280CMBRU	10.53.33.37	XVC11852	yellow	81,0%	Toner	Color	25.393
EPRT00281BMBRU	10.54.225.29	XNW01089	black	64,0%	Toner	B/W	4.493
EPRT00282BMBRU	10.54.225.30	XNW01094	black	23,0%	Toner	B/W	16.205
EPRT00283CMLUX	192.168.51.22	XVC13468	black	89,0%	Toner	Color	9.242
EPRT00283CMLUX	192.168.51.22	XVC13468	cyan	92,0%	Toner	Color	9.242
EPRT00283CMLUX	192.168.51.22	XVC13468	magenta	91,0%	Toner	Color	9.242
EPRT00283CMLUX	192.168.51.22	XVC13468	yellow	90,0%	Toner	Color	9.242
EPRT00284BMLUX	10.48.33.27	XNW01127	black	80,0%	Toner	B/W	353
EPRT00285BMLUX	10.48.33.28	XNW01178	black	86,0%	Toner	B/W	6.297
EPRT00286BMLUX	10.48.33.29	XNW01172	black	53,0%	Toner	B/W	9.970
EPRT00287BMLUX	10.48.33.30	XNW01176	black	69,0%	Toner	B/W	2.789
EPRT00288BMLUX	10.48.33.31	XNW01140	black	44,0%	Toner	B/W	10.967
EPRT00289BMLUX	10.48.33.32	XNW01168	black	36,0%	Toner	B/W	16.811
EPRT00290BMLUX	10.48.33.33	XNW01159	black	64,0%	Toner	B/W	3.931
EPRT00291BMLUX	10.48.33.34	XNW01177	black	63,0%	Toner	B/W	9.746
EPRT00292CMLUX	10.48.33.35	XVC12865	black	97,0%	Toner	Color	1.881
EPRT00292CMLUX	10.48.33.35	XVC12865	cyan	99,0%	Toner	Color	1.881
EPRT00292CMLUX	10.48.33.35	XVC12865	magenta	99,0%	Toner	Color	1.881
EPRT00292CMLUX	10.48.33.35	XVC12865	yellow	98,0%	Toner	Color	1.881
EPRT00293BMLUX	10.48.33.36	XNW01162	black	78,0%	Toner	B/W	92
EPRT00294BMLUX	10.48.33.37	XNW01222	black	38,0%	Toner	B/W	6.760
EPRT00295BMLUX	10.48.33.38	XNW01218	black	25,0%	Toner	B/W	4.832
EPRT00296BMLUX	10.48.33.39	XNW01235	black	80,0%	Toner	B/W	75
EPRT00297BMLUX	10.48.33.40	XNW01280	black	79,0%	Toner	B/W	751
EPRT00298BMLUX	10.48.33.41	XNW01393	black	60,0%	Toner	B/W	4.887
EPRT00299BMLUX	10.48.33.42	XNW01259	black	66,0%	Toner	B/W	5.452
EPRT00300CMLUX	10.48.33.43	XVC12858	black	79,0%	Toner	Color	13.909
EPRT00300CMLUX	10.48.33.43	XVC12858	cyan	91,0%	Toner	Color	13.909
EPRT00300CMLUX	10.48.33.43	XVC12858	magenta	89,0%	Toner	Color	13.909
EPRT00300CMLUX	10.48.33.43	XVC12858	yellow	90,0%	Toner	Color	13.909
EPRT00301BMLUX	10.48.33.44	XNW01385	black	30,0%	Toner	B/W	11.678
EPRT00302CMLUX	10.48.33.45	XVC12862	black	78,0%	Toner	Color	20.144
EPRT00302CMLUX	10.48.33.45	XVC12862	cyan	90,0%	Toner	Color	20.144
EPRT00302CMLUX	10.48.33.45	XVC12862	magenta	90,0%	Toner	Color	20.144
EPRT00302CMLUX	10.48.33.45	XVC12862	yellow	90,0%	Toner	Color	20.144
EPRT00303BMLUX	10.48.33.46	XNW01405	black	27,0%	Toner	B/W	18.535
EPRT00304BMLUX	10.48.33.47	XNW01398	black	25,0%	Toner	B/W	14.810
EPRT00305CMLUX	10.48.33.48	XVC12863	black	71,0%	Toner	Color	26.232
EPRT00305CMLUX	10.48.33.48	XVC12863	cyan	85,0%	Toner	Color	26.232
EPRT00305CMLUX	10.48.33.48	XVC12863	magenta	83,0%	Toner	Color	26.232
EPRT00305CMLUX	10.48.33.48	XVC12863	yellow	85,0%	Toner	Color	26.232
EPRT00306CMLUX	10.48.33.49	XVC12857	black	74,0%	Toner	Color	24.288

EPRT00306CMLUX	10.48.33.49	XVC12857	cyan	86,0%	Toner	Color	24.288
EPRT00306CMLUX	10.48.33.49	XVC12857	magenta	85,0%	Toner	Color	24.288
EPRT00306CMLUX	10.48.33.49	XVC12857	yellow	86,0%	Toner	Color	24.288
EPRT00307BMLUX	10.48.33.50	XNW01389	black	11,0%	Toner	B/W	42.696
EPRT00308BMLUX	10.48.33.51	XNW01401	black	72,0%	Toner	B/W	1.923
EPRT00309CMLUX	10.48.33.52	XVC12866	black	77,0%	Toner	Color	19.439
EPRT00309CMLUX	10.48.33.52	XVC12866	cyan	83,0%	Toner	Color	19.439
EPRT00309CMLUX	10.48.33.52	XVC12866	magenta	87,0%	Toner	Color	19.439
EPRT00309CMLUX	10.48.33.52	XVC12866	yellow	86,0%	Toner	Color	19.439
EPRT00310BMLUX	10.48.33.53	XNW01277	black	40,0%	Toner	B/W	9.207
EPRT00311BMLUX	10.48.33.54	XNW01384	black	76,0%	Toner	B/W	616
EPRT00312CMLUX	10.48.33.55	XVC12859	black	62,0%	Toner	Color	35.482
EPRT00312CMLUX	10.48.33.55	XVC12859	cyan	77,0%	Toner	Color	35.482
EPRT00312CMLUX	10.48.33.55	XVC12859	magenta	76,0%	Toner	Color	35.482
EPRT00312CMLUX	10.48.33.55	XVC12859	yellow	77,0%	Toner	Color	35.482
EPRT00313BMLUX	10.48.33.56	XNW01270	black	44,0%	Toner	B/W	9.930
EPRT00314BMLUX	10.48.33.57	XNW01394	black	11,0%	Toner	B/W	31.174
EPRT00315BMLUX	10.48.33.58	XNW01402	black	17,0%	Toner	B/W	23.090
EPRT00316CMLUX	10.48.33.59	XVC12850	black	92,0%	Toner	Color	6.785
EPRT00316CMLUX	10.48.33.59	XVC12850	cyan	95,0%	Toner	Color	6.785
EPRT00316CMLUX	10.48.33.59	XVC12850	magenta	95,0%	Toner	Color	6.785
EPRT00316CMLUX	10.48.33.59	XVC12850	yellow	95,0%	Toner	Color	6.785
EPRT00317BMLUX	10.48.33.60	XNW01341	black	59,0%	Toner	B/W	4.137
EPRT00319BMLUX	10.48.161.26	XNW01373	black	78,0%	Toner	B/W	317
EPRT00320CMLUX	192.168.78.198	XVC13475	black	75,0%	Toner	Color	19.671
EPRT00320CMLUX	192.168.78.198	XVC13475	cyan	87,0%	Toner	Color	19.671
EPRT00320CMLUX	192.168.78.198	XVC13475	magenta	87,0%	Toner	Color	19.671
EPRT00320CMLUX	192.168.78.198	XVC13475	yellow	89,0%	Toner	Color	19.671
EPRT00321BMLUX	10.48.161.18	XNW01314	black	66,0%	Toner	B/W	4.193
EPRT00322BMLUX	10.48.161.19	XNW01376	black	69,0%	Toner	B/W	2.642
EPRT00323BMLUX	10.48.161.20	XNW01278	black	74,0%	Toner	B/W	776
EPRT00324BMLUX	10.48.161.21	XNW01223	black	16,0%	Toner	B/W	9.985
EPRT00325BMLUX	10.48.161.22	XNW01224	black	18,0%	Toner	B/W	14.127
EPRT00326BMLUX	10.48.161.23	XNW01386	black	69,0%	Toner	B/W	3.632
EPRT00327BMLUX	10.48.161.24	XNW01374	black	15,0%	Toner	B/W	17.188
EPRT00328BMLUX	10.48.161.25	XNW01331	black	68,0%	Toner	B/W	2.009
EPRT00329BMLUX	10.48.97.1	XNW01250	black	70,0%	Toner	B/W	2.854
EPRT00330BMLUX	10.48.97.2	XNW01238	black	72,0%	Toner	B/W	451
EPRT00331BMLUX	10.48.97.3	XNW01279	black	76,0%	Toner	B/W	592
EPRT00332BMLUX	10.48.97.4	XNW01290	black	77,0%	Toner	B/W	474
EPRT00333BMLUX	10.48.97.5	XNW01247	black	72,0%	Toner	B/W	4.272
EPRT00334BMLUX	10.48.97.6	XNW01237	black	75,0%	Toner	B/W	1.036
EPRT00335BMLUX	10.48.97.7	XNW01284	black	72,0%	Toner	B/W	1.730
EPRT00336BMLUX	10.48.97.8	XNW01287	black	51,0%	Toner	B/W	10.250
EPRT00337BMLUX	10.48.97.9	XNW01283	black	71,0%	Toner	B/W	1.597

EPRT00338BMLUX	10.48.97.10	XNW01289	black	76,0%	Toner	B/W	716
EPRT00339BMLUX	10.48.97.11	XNW01281	black	57,0%	Toner	B/W	3.881
EPRT00340BMLUX	10.48.97.12	XNW01257	black	68,0%	Toner	B/W	2.120
EPRT00341BMLUX	10.48.97.13	XNW01258	black	70,0%	Toner	B/W	3.193
EPRT00342BMLUX	10.48.97.14	XNW01399	black	72,0%	Toner	B/W	2.696
EPRT00343BMLUX	10.48.97.15	XNW01400	black	61,0%	Toner	B/W	2.884
EPRT00344BMLUX	10.48.97.16	XNW01403	black	72,0%	Toner	B/W	666
EPRT00345BMLUX	10.48.97.17	XNW01282	black	55,0%	Toner	B/W	9.303
EPRT00346BMLUX	10.48.97.18	XNW01274	black	67,0%	Toner	B/W	1.504
EPRT00347BMLUX	10.48.97.19	XNW01395	black	51,0%	Toner	B/W	6.677
EPRT00348BMLUX	10.48.97.20	XNW01409	black	67,0%	Toner	B/W	3.323
EPRT00349BMLUX	10.48.97.21	XNW01242	black	76,0%	Toner	B/W	1.693
EPRT00350BMLUX	10.48.97.22	XNW01342	black	46,0%	Toner	B/W	10.459
EPRT00351BMLUX	10.48.97.23	XNW01340	black	45,0%	Toner	B/W	8.912
EPRT00352BMLUX	10.48.97.24	XNW01337	black	59,0%	Toner	B/W	5.787
EPRT00353BMLUX	10.48.97.25	XNW01339	black	15,0%	Toner	B/W	11.901
EPRT00354BMLUX	10.48.97.26	XNW01322	black	63,0%	Toner	B/W	4.407
EPRT00355BMLUX	10.48.97.27	XNW01344	black	31,0%	Toner	B/W	17.341
EPRT00356BMSTR	10.57.33.2	XNW01184	black	95,0%	Toner	B/W	762
EPRT00357BMSTR	10.57.33.3	XNW01228	black	76,0%	Toner	B/W	276
EPRT00358BMSTR	10.57.33.4	XNW01038	black	63,0%	Toner	B/W	7.310
EPRT00359BMSTR	10.57.33.5	XNW01133	black	76,0%	Toner	B/W	1.222
EPRT00360BMSTR	10.57.33.6	XNW01187	black	74,0%	Toner	B/W	1.758
EPRT00361BMSTR	10.57.33.7	XNW01198	black	30,0%	Toner	B/W	21.228
EPRT00362BMSTR	10.57.33.8	XNW01185	black	78,0%	Toner	B/W	1.591
EPRT00363CMSTR	10.57.97.9	XVC13490	black	54,0%	Toner	Color	28.624
EPRT00363CMSTR	10.57.97.9	XVC13490	cyan	75,0%	Toner	Color	28.624
EPRT00363CMSTR	10.57.97.9	XVC13490	magenta	81,0%	Toner	Color	28.624
EPRT00363CMSTR	10.57.97.9	XVC13490	yellow	80,0%	Toner	Color	28.624
EPRT00365BMSTR	10.56.33.23	XNW01195	black	70,0%	Toner	B/W	3.530
EPRT00366CMSTR	10.56.33.24	XVC13493	black	57,0%	Toner	Color	23.623
EPRT00366CMSTR	10.56.33.24	XVC13493	cyan	79,0%	Toner	Color	23.623
EPRT00366CMSTR	10.56.33.24	XVC13493	magenta	81,0%	Toner	Color	23.623
EPRT00366CMSTR	10.56.33.24	XVC13493	yellow	68,0%	Toner	Color	23.623
EPRT00367BMSTR	10.56.33.25	XNW01166	black	91,0%	Toner	B/W	3.188
EPRT00368BMSTR	10.56.33.26	XNW01139	black	83,0%	Toner	B/W	1.405
EPRT00369CMSTR	10.56.33.27	XVC13496	black	93,0%	Toner	Color	5.176
EPRT00369CMSTR	10.56.33.27	XVC13496	cyan	95,0%	Toner	Color	5.176
EPRT00369CMSTR	10.56.33.27	XVC13496	magenta	96,0%	Toner	Color	5.176
EPRT00369CMSTR	10.56.33.27	XVC13496	yellow	96,0%	Toner	Color	5.176
EPRT00370BMSTR	10.56.33.28	XNW01182	black	75,0%	Toner	B/W	905
EPRT00371BMSTR	10.56.33.29	XNW01137	black	85,0%	Toner	B/W	4.745
EPRT00372BMSTR	10.56.33.30	XNW01188	black	28,0%	Toner	B/W	13.727
EPRT00373CMSTR	10.56.33.31	XVC13483	black	98,0%	Toner	Color	1.424
EPRT00373CMSTR	10.56.33.31	XVC13483	cyan	99,0%	Toner	Color	1.424

EPRT00373CMSTR	10.56.33.31	XVC13483	magenta	99,0%	Toner	Color	1.424
EPRT00373CMSTR	10.56.33.31	XVC13483	yellow	99,0%	Toner	Color	1.424
EPRT00374CMSTR	10.56.33.32	XVC13486	black	99,0%	Toner	Color	85
EPRT00374CMSTR	10.56.33.32	XVC13486	cyan	99,0%	Toner	Color	85
EPRT00374CMSTR	10.56.33.32	XVC13486	magenta	99,0%	Toner	Color	85
EPRT00374CMSTR	10.56.33.32	XVC13486	yellow	99,0%	Toner	Color	85
EPRT00375CMSTR	10.56.33.33	XVC13451	black	94,0%	Toner	Color	3.769
EPRT00375CMSTR	10.56.33.33	XVC13451	cyan	98,0%	Toner	Color	3.769
EPRT00375CMSTR	10.56.33.33	XVC13451	magenta	98,0%	Toner	Color	3.769
EPRT00375CMSTR	10.56.33.33	XVC13451	yellow	98,0%	Toner	Color	3.769
EPRT00376CMSTR	10.56.33.34	XVC13485	black	92,0%	Toner	Color	7.049
EPRT00376CMSTR	10.56.33.34	XVC13485	cyan	97,0%	Toner	Color	7.049
EPRT00376CMSTR	10.56.33.34	XVC13485	magenta	98,0%	Toner	Color	7.049
EPRT00376CMSTR	10.56.33.34	XVC13485	yellow	98,0%	Toner	Color	7.049
EPRT00377BMSTR	10.56.33.35	XNW01189	black	53,0%	Toner	B/W	5.317
EPRT00378CMSTR	10.56.33.36	XVC13489	black	96,0%	Toner	Color	2.954
EPRT00378CMSTR	10.56.33.36	XVC13489	cyan	98,0%	Toner	Color	2.954
EPRT00378CMSTR	10.56.33.36	XVC13489	magenta	99,0%	Toner	Color	2.954
EPRT00378CMSTR	10.56.33.36	XVC13489	yellow	98,0%	Toner	Color	2.954
EPRT00379BMSTR	10.56.33.37	XNW00959	black	57,0%	Toner	B/W	3.614
EPRT00380BMSTR	10.56.33.38	XNW01161	black	75,0%	Toner	B/W	780
EPRT00381CMSTR	10.56.33.39	XVC13480	black	99,0%	Toner	Color	40
EPRT00381CMSTR	10.56.33.39	XVC13480	cyan	99,0%	Toner	Color	40
EPRT00381CMSTR	10.56.33.39	XVC13480	magenta	99,0%	Toner	Color	40
EPRT00381CMSTR	10.56.33.39	XVC13480	yellow	99,0%	Toner	Color	40
EPRT00382CMSTR	10.56.33.40	XVC13481	black	86,0%	Toner	Color	10.232
EPRT00382CMSTR	10.56.33.40	XVC13481	cyan	87,0%	Toner	Color	10.232
EPRT00382CMSTR	10.56.33.40	XVC13481	magenta	87,0%	Toner	Color	10.232
EPRT00382CMSTR	10.56.33.40	XVC13481	yellow	82,0%	Toner	Color	10.232
EPRT00383BMSTR	10.56.33.41	XNW01148	black	59,0%	Toner	B/W	4.851
EPRT00384BMSTR	10.56.33.42	XNW01164	black	77,0%	Toner	B/W	5.906
EPRT00386BMSTR	10.56.33.44	XNW01150	black	63,0%	Toner	B/W	9.792
EPRT00387BMSTR	10.56.161.2	XNW01221	black	77,0%	Toner	B/W	1.921
EPRT00389BMSTR	10.56.161.4	XNW01138	black	84,0%	Toner	B/W	5.356
EPRT00390BMSTR	10.56.161.5	XNW01179	black	68,0%	Toner	B/W	725
EPRT00391BMSTR	10.56.161.6	XNW01135	black	65,0%	Toner	B/W	1.977
EPRT00392BMSTR	10.56.161.7	XNW01158	black	69,0%	Toner	B/W	1.779
EPRT00393BMSTR	10.56.161.8	XNW01215	black	57,0%	Toner	B/W	5.370
EPRT00394BMSTR	10.56.161.9	XNW01231	black	63,0%	Toner	B/W	3.359
EPRT00395CMSTR	10.56.161.10	XVC13477	black	91,0%	Toner	Color	5.588
EPRT00395CMSTR	10.56.161.10	XVC13477	cyan	96,0%	Toner	Color	5.588
EPRT00395CMSTR	10.56.161.10	XVC13477	magenta	95,0%	Toner	Color	5.588
EPRT00395CMSTR	10.56.161.10	XVC13477	yellow	95,0%	Toner	Color	5.588
EPRT00396BMSTR	10.56.161.11	XNW01239	black	76,0%	Toner	B/W	1.541
EPRT00397CMSTR	10.56.161.12	XVC13476	black	77,0%	Toner	Color	12.520

EPRT00397CMSTR	10.56.161.12	XVC13476	cyan	85,0%	Toner	Color	12.520
EPRT00397CMSTR	10.56.161.12	XVC13476	magenta	87,0%	Toner	Color	12.520
EPRT00397CMSTR	10.56.161.12	XVC13476	yellow	88,0%	Toner	Color	12.520
EPRT00399BMSTR	10.56.225.3	XNW01217	black	16,0%	Toner	B/W	14.246
EPRT00400BMSTR	10.56.225.4	XNW01230	black	75,0%	Toner	B/W	1.127
EPRT00401BMSTR	10.56.225.5	XNW01387	black	69,0%	Toner	B/W	3.164
EPRT00402BMSTR	10.56.225.6	XNW01232	black	61,0%	Toner	B/W	4.064
EPRT00403BMSTR	10.56.225.7	XNW01406	black	33,0%	Toner	B/W	9.835
EPRT00404BMSTR	10.56.225.8	XNW01256	black	67,0%	Toner	B/W	2.497
EPRT00405BMSTR	10.56.225.9	XNW01390	black	57,0%	Toner	B/W	4.938
EPRT00406CMSTR	10.56.225.10	XVC13479	black	67,0%	Toner	Color	22.397
EPRT00406CMSTR	10.56.225.10	XVC13479	cyan	84,0%	Toner	Color	22.397
EPRT00406CMSTR	10.56.225.10	XVC13479	magenta	88,0%	Toner	Color	22.397
EPRT00406CMSTR	10.56.225.10	XVC13479	yellow	75,0%	Toner	Color	22.397
EPRT00407BMSTR	10.56.225.11	XNW01397	black	15,0%	Toner	B/W	13.646
EPRT00408BMSTR	10.56.225.12	XNW01396	black	47,0%	Toner	B/W	7.271
EPRT00409CMSTR	10.56.225.13	XVC13469	black	23,0%	Toner	Color	50.322
EPRT00409CMSTR	10.56.225.13	XVC13469	cyan	48,0%	Toner	Color	50.322
EPRT00409CMSTR	10.56.225.13	XVC13469	magenta	56,0%	Toner	Color	50.322
EPRT00409CMSTR	10.56.225.13	XVC13469	yellow	43,0%	Toner	Color	50.322
EPRT00410BMSTR	10.57.97.6	XNW01227	black	58,0%	Toner	B/W	4.046
EPRT00411BMSTR	10.57.97.7	XNW01216	black	78,0%	Toner	B/W	61
EPRT00412BMSTR	10.57.97.8	XNW01236	black	50,0%	Toner	B/W	5.778
EPRT00413BMSTR	10.56.97.11	XNW01404	black	66,0%	Toner	B/W	1.913
EPRT00415BMSTR	10.56.97.13	XNW01260	black	73,0%	Toner	B/W	2.183
EPRT00416BMSTR	10.56.225.14	XNW01240	black	19,0%	Toner	B/W	15.310
EPRT00417BMSTR	10.56.97.15	XNW01261	black	78,0%	Toner	B/W	1.192
EPRT00418BMSTR	10.56.97.16	XNW01229	black	51,0%	Toner	B/W	10.413
EPRT00419BMSTR	10.56.97.17	XNW01234	black	76,0%	Toner	B/W	426
EPRT00420BMSTR	10.56.97.18	XNW01233	black	78,0%	Toner	B/W	188
EPRT00421BMSTR	10.57.97.10	XNW01225	black	15,0%	Toner	B/W	13.661
EPRT00423BMATH	192.168.38.197	XNW00973	black	77,0%	Toner	B/W	193
EPRT00424BMATH	192.168.38.199	XNW00960	black	76,0%	Toner	B/W	727
EPRT00425CMATH	192.168.38.196	XVC14063	black	43,0%	Toner	Color	43.136
EPRT00425CMATH	192.168.38.196	XVC14063	cyan	60,0%	Toner	Color	43.136
EPRT00425CMATH	192.168.38.196	XVC14063	magenta	62,0%	Toner	Color	43.136
EPRT00425CMATH	192.168.38.196	XVC14063	yellow	30,0%	Toner	Color	43.136
EPRT00426BMBAR	192.168.45.208	XNW01275	black	40,0%	Toner	B/W	9.604
EPRT00427CMBAR	192.168.45.207	XVC14323	black	91,0%	Toner	Color	10.411
EPRT00427CMBAR	192.168.45.207	XVC14323	cyan	86,0%	Toner	Color	10.411
EPRT00427CMBAR	192.168.45.207	XVC14323	magenta	88,0%	Toner	Color	10.411
EPRT00427CMBAR	192.168.45.207	XVC14323	yellow	92,0%	Toner	Color	10.411
EPRT00428CMBER	192.168.33.207	XVC13912	black	81,0%	Toner	Color	18.422
EPRT00428CMBER	192.168.33.207	XVC13912	cyan	55,0%	Toner	Color	18.422
EPRT00428CMBER	192.168.33.207	XVC13912	magenta	81,0%	Toner	Color	18.422



EPRT00428CMBER	192.168.33.207	XVC13912	yellow	82,0%	Toner	Color	18.422
EPRT00429CMBER	192.168.33.208	XVC13918	black	72,0%	Toner	Color	30.053
EPRT00429CMBER	192.168.33.208	XVC13918	cyan	59,0%	Toner	Color	30.053
EPRT00429CMBER	192.168.33.208	XVC13918	magenta	61,0%	Toner	Color	30.053
EPRT00429CMBER	192.168.33.208	XVC13918	yellow	74,0%	Toner	Color	30.053
EPRT00430BMBRA	192.168.49.209	XNW01020	black	57,0%	Toner	B/W	2.644
EPRT00431CMBRA	192.168.49.208	XVC12458	black	90,0%	Toner	Color	11.037
EPRT00431CMBRA	192.168.49.208	XVC12458	cyan	86,0%	Toner	Color	11.037
EPRT00431CMBRA	192.168.49.208	XVC12458	magenta	87,0%	Toner	Color	11.037
EPRT00431CMBRA	192.168.49.208	XVC12458	yellow	88,0%	Toner	Color	11.037
EPRT00433CMBUC	192.168.74.209	XVC10751	black	88,0%	Toner	Color	8.908
EPRT00433CMBUC	192.168.74.209	XVC10751	cyan	92,0%	Toner	Color	8.908
EPRT00433CMBUC	192.168.74.209	XVC10751	magenta	94,0%	Toner	Color	8.908
EPRT00433CMBUC	192.168.74.209	XVC10751	yellow	95,0%	Toner	Color	8.908
EPRT00434CMBUD	192.168.48.209	XVC12073	black	73,0%	Toner	Color	18.629
EPRT00434CMBUD	192.168.48.209	XVC12073	cyan	70,0%	Toner	Color	18.629
EPRT00434CMBUD	192.168.48.209	XVC12073	magenta	76,0%	Toner	Color	18.629
EPRT00434CMBUD	192.168.48.209	XVC12073	yellow	82,0%	Toner	Color	18.629
EPRT00435BMLAH	192.168.32.208	XNW01359	black	15,0%	Toner	B/W	11.822
EPRT00437BMDUB	192.168.35.209	XNW01408	black	57,0%	Toner	B/W	5.422
EPRT00438CMDUB	192.168.35.208	XVC14403	black	91,0%	Toner	Color	8.007
EPRT00438CMDUB	192.168.35.208	XVC14403	cyan	89,0%	Toner	Color	8.007
EPRT00438CMDUB	192.168.35.208	XVC14403	magenta	93,0%	Toner	Color	8.007
EPRT00438CMDUB	192.168.35.208	XVC14403	yellow	94,0%	Toner	Color	8.007
EPRT00439BMEDI	192.168.42.209	XNW01262	black	77,0%	Toner	B/W	987
EPRT00440CMHEL	192.168.40.206	XVC14452	black	84,0%	Toner	Color	17.550
EPRT00440CMHEL	192.168.40.206	XVC14452	cyan	69,0%	Toner	Color	17.550
EPRT00440CMHEL	192.168.40.206	XVC14452	magenta	77,0%	Toner	Color	17.550
EPRT00440CMHEL	192.168.40.206	XVC14452	yellow	79,0%	Toner	Color	17.550
EPRT00441BMCOP	192.168.30.209	XNW01301	black	53,0%	Toner	B/W	3.736
EPRT00443CMCOP	192.168.30.208	XVC13567	black	75,0%	Toner	Color	21.746
EPRT00443CMCOP	192.168.30.208	XVC13567	cyan	69,0%	Toner	Color	21.746
EPRT00443CMCOP	192.168.30.208	XVC13567	magenta	79,0%	Toner	Color	21.746
EPRT00443CMCOP	192.168.30.208	XVC13567	yellow	84,0%	Toner	Color	21.746
EPRT00444CMLAV	192.168.70.208	XVC12061	black	93,0%	Toner	Color	6.117
EPRT00444CMLAV	192.168.70.208	XVC12061	cyan	92,0%	Toner	Color	6.117
EPRT00444CMLAV	192.168.70.208	XVC12061	magenta	95,0%	Toner	Color	6.117
EPRT00444CMLAV	192.168.70.208	XVC12061	yellow	95,0%	Toner	Color	6.117
EPRT00446CMLIS	192.168.37.207	XVC12659	black	64,0%	Toner	Color	39.857
EPRT00446CMLIS	192.168.37.207	XVC12659	cyan	37,0%	Toner	Color	39.857
EPRT00446CMLIS	192.168.37.207	XVC12659	magenta	70,0%	Toner	Color	39.857
EPRT00446CMLIS	192.168.37.207	XVC12659	yellow	71,0%	Toner	Color	39.857
EPRT00447BMLJU	192.168.66.209	XNW00975	black	75,0%	Toner	B/W	606
EPRT00448CMLJU	192.168.66.208	XVC12107	black	65,0%	Toner	Color	23.543
EPRT00448CMLJU	192.168.66.208	XVC12107	cyan	14,0%	Toner	Color	23.543

EPRT00448CMLJU	192.168.66.208	XVC12107	magenta	23,0%	Toner	Color	23.543
EPRT00448CMLJU	192.168.66.208	XVC12107	yellow	5,0%	Toner	Color	23.543
EPRT00450CMLON	192.168.31.208	XVC13615	black	86,0%	Toner	Color	14.437
EPRT00450CMLON	192.168.31.208	XVC13615	cyan	81,0%	Toner	Color	14.437
EPRT00450CMLON	192.168.31.208	XVC13615	magenta	83,0%	Toner	Color	14.437
EPRT00450CMLON	192.168.31.208	XVC13615	yellow	90,0%	Toner	Color	14.437
EPRT00453BMMAD	192.168.29.207	XNW01200	black	59,0%	Toner	B/W	5.345
EPRT00454BMMAD	192.168.29.209	XNW01204	black	45,0%	Toner	B/W	7.677
EPRT00455CMMAD	192.168.29.208	XVC14328	black	89,0%	Toner	Color	8.556
EPRT00455CMMAD	192.168.29.208	XVC14328	cyan	85,0%	Toner	Color	8.556
EPRT00455CMMAD	192.168.29.208	XVC14328	magenta	87,0%	Toner	Color	8.556
EPRT00455CMMAD	192.168.29.208	XVC14328	yellow	91,0%	Toner	Color	8.556
EPRT00456BMMAR	192.168.44.209	XNW01303	black	76,0%	Toner	B/W	166
EPRT00457CMMAR	192.168.44.208	XVC13673	black	79,0%	Toner	Color	16.012
EPRT00457CMMAR	192.168.44.208	XVC13673	cyan	65,0%	Toner	Color	16.012
EPRT00457CMMAR	192.168.44.208	XVC13673	magenta	74,0%	Toner	Color	16.012
EPRT00457CMMAR	192.168.44.208	XVC13673	yellow	79,0%	Toner	Color	16.012
EPRT00458BMMIL	192.168.43.209	XNW01325	black	34,0%	Toner	B/W	10.103
EPRT00459CMMUN	192.168.46.208	XVC13919	black	93,0%	Toner	Color	5.519
EPRT00459CMMUN	192.168.46.208	XVC13919	cyan	92,0%	Toner	Color	5.519
EPRT00459CMMUN	192.168.46.208	XVC13919	magenta	94,0%	Toner	Color	5.519
EPRT00459CMMUN	192.168.46.208	XVC13919	yellow	95,0%	Toner	Color	5.519
EPRT00460BMNIC	192.168.68.208	XNW00854	black	59,0%	Toner	B/W	1.307
EPRT00461CMNIC	192.168.68.209	XVC12048	black	84,0%	Toner	Color	11.408
EPRT00461CMNIC	192.168.68.209	XVC12048	cyan	45,0%	Toner	Color	11.408
EPRT00461CMNIC	192.168.68.209	XVC12048	magenta	56,0%	Toner	Color	11.408
EPRT00461CMNIC	192.168.68.209	XVC12048	yellow	65,0%	Toner	Color	11.408
EPRT00462BMPAR	192.168.28.207	XNW01311	black	68,0%	Toner	B/W	3.740
EPRT00463CMPAR	192.168.28.195	XVC13664	black	82,0%	Toner	Color	15.011
EPRT00463CMPAR	192.168.28.195	XVC13664	cyan	87,0%	Toner	Color	15.011
EPRT00463CMPAR	192.168.28.195	XVC13664	magenta	89,0%	Toner	Color	15.011
EPRT00463CMPAR	192.168.28.195	XVC13664	yellow	90,0%	Toner	Color	15.011
EPRT00464CMPAR	192.168.28.196	XVC13677	black	98,0%	Toner	Color	1.527
EPRT00464CMPAR	192.168.28.196	XVC13677	cyan	98,0%	Toner	Color	1.527
EPRT00464CMPAR	192.168.28.196	XVC13677	magenta	99,0%	Toner	Color	1.527
EPRT00464CMPAR	192.168.28.196	XVC13677	yellow	99,0%	Toner	Color	1.527
EPRT00465CMPRA	192.168.47.209	XVC12463	black	95,0%	Toner	Color	5.446
EPRT00465CMPRA	192.168.47.209	XVC12463	cyan	84,0%	Toner	Color	5.446
EPRT00465CMPRA	192.168.47.209	XVC12463	magenta	86,0%	Toner	Color	5.446
EPRT00465CMPRA	192.168.47.209	XVC12463	yellow	86,0%	Toner	Color	5.446
EPRT00466BMRIG	192.168.60.209	XNW01288	black	46,0%	Toner	B/W	4.642
EPRT00467CMRIG	192.168.60.208	XVC13982	black	24,0%	Toner	Color	85.814
EPRT00467CMRIG	192.168.60.208	XVC13982	cyan	66,0%	Toner	Color	85.814
EPRT00467CMRIG	192.168.60.208	XVC13982	magenta	89,0%	Toner	Color	85.814
EPRT00467CMRIG	192.168.60.208	XVC13982	yellow	9,0%	Toner	Color	85.814

EPRT00469BMROM	192.168.36.210	XNW01329	black	39,0%	Toner	B/W	8.442
EPRT00471CMROM	192.168.36.207	XVC14283	black	13,0%	Toner	Color	77.074
EPRT00471CMROM	192.168.36.207	XVC14283	cyan	72,0%	Toner	Color	77.074
EPRT00471CMROM	192.168.36.207	XVC14283	magenta	9,0%	Toner	Color	77.074
EPRT00471CMROM	192.168.36.207	XVC14283	yellow	31,0%	Toner	Color	77.074
EPRT00472CMSOF	192.168.72.209	XVC12414	black	86,0%	Toner	Color	9.426
EPRT00472CMSOF	192.168.72.209	XVC12414	cyan	78,0%	Toner	Color	9.426
EPRT00472CMSOF	192.168.72.209	XVC12414	magenta	83,0%	Toner	Color	9.426
EPRT00472CMSOF	192.168.72.209	XVC12414	yellow	84,0%	Toner	Color	9.426
EPRT00473BMSOF	192.168.72.206	XNW00925	black	76,0%	Toner	B/W	2.068
EPRT00474CMSTO	192.168.41.208	XVC14118	black	84,0%	Toner	Color	13.397
EPRT00474CMSTO	192.168.41.208	XVC14118	cyan	84,0%	Toner	Color	13.397
EPRT00474CMSTO	192.168.41.208	XVC14118	magenta	89,0%	Toner	Color	13.397
EPRT00474CMSTO	192.168.41.208	XVC14118	yellow	88,0%	Toner	Color	13.397
EPRT00475CMTAL	192.168.62.209	XVC13981	black	94,0%	Toner	Color	6.629
EPRT00475CMTAL	192.168.62.209	XVC13981	cyan	94,0%	Toner	Color	6.629
EPRT00475CMTAL	192.168.62.209	XVC13981	magenta	95,0%	Toner	Color	6.629
EPRT00475CMTAL	192.168.62.209	XVC13981	yellow	95,0%	Toner	Color	6.629
EPRT00476CMVIL	192.168.64.209	XVC14007	black	88,0%	Toner	Color	7.915
EPRT00476CMVIL	192.168.64.209	XVC14007	cyan	94,0%	Toner	Color	7.915
EPRT00476CMVIL	192.168.64.209	XVC14007	magenta	95,0%	Toner	Color	7.915
EPRT00476CMVIL	192.168.64.209	XVC14007	yellow	96,0%	Toner	Color	7.915
EPRT00477CMWAS	192.168.50.208	XVC12063	black	74,0%	Toner	Color	18.929
EPRT00477CMWAS	192.168.50.208	XVC12063	cyan	55,0%	Toner	Color	18.929
EPRT00477CMWAS	192.168.50.208	XVC12063	magenta	62,0%	Toner	Color	18.929
EPRT00477CMWAS	192.168.50.208	XVC12063	yellow	60,0%	Toner	Color	18.929
EPRT00478BMVIE	192.168.39.209	XNW00963	black	73,0%	Toner	B/W	4.108
EPRT00479CMVIE	192.168.39.208	XVC12057	black	87,0%	Toner	Color	9.573
EPRT00479CMVIE	192.168.39.208	XVC12057	cyan	85,0%	Toner	Color	9.573
EPRT00479CMVIE	192.168.39.208	XVC12057	magenta	88,0%	Toner	Color	9.573
EPRT00479CMVIE	192.168.39.208	XVC12057	yellow	89,0%	Toner	Color	9.573
EPRT00480CMWRO	192.168.82.208	XVC12116	black	93,0%	Toner	Color	5.543
EPRT00480CMWRO	192.168.82.208	XVC12116	cyan	76,0%	Toner	Color	5.543
EPRT00480CMWRO	192.168.82.208	XVC12116	magenta	81,0%	Toner	Color	5.543
EPRT00480CMWRO	192.168.82.208	XVC12116	yellow	83,0%	Toner	Color	5.543
EPRT00481BMZAG	192.168.59.209	XNW01105	black	67,0%	Toner	B/W	3.299
EPRT00482CMZAG	192.168.59.208	XVC12276	black	90,0%	Toner	Color	8.085
EPRT00482CMZAG	192.168.59.208	XVC12276	cyan	93,0%	Toner	Color	8.085
EPRT00482CMZAG	192.168.59.208	XVC12276	magenta	94,0%	Toner	Color	8.085
EPRT00482CMZAG	192.168.59.208	XVC12276	yellow	95,0%	Toner	Color	8.085
EPRT00483BMBRU	10.53.33.6	XXT00655	black	59,0%	Toner	B/W	12.445
EPRT00563CMBRU	10.52.161.10	XVC00642	black	91,0%	Toner	Color	8.344
EPRT00563CMBRU	10.52.161.10	XVC00642	cyan	96,0%	Toner	Color	8.344
EPRT00563CMBRU	10.52.161.10	XVC00642	magenta	95,0%	Toner	Color	8.344
EPRT00563CMBRU	10.52.161.10	XVC00642	yellow	95,0%	Toner	Color	8.344

EPRT00564BMBRU	10.53.97.8	XXT00658	black	70,0%	Toner	B/W	2.913
EPRT00565CMBRU	10.53.33.3	XVC01581	black	96,0%	Toner	Color	2.269
EPRT00565CMBRU	10.53.33.3	XVC01581	cyan	97,0%	Toner	Color	2.269
EPRT00565CMBRU	10.53.33.3	XVC01581	magenta	97,0%	Toner	Color	2.269
EPRT00565CMBRU	10.53.33.3	XVC01581	yellow	97,0%	Toner	Color	2.269
EPRT00566CMBRU	10.54.225.33	XVC01230	black	93,0%	Toner	Color	1.494
EPRT00566CMBRU	10.54.225.33	XVC01230	cyan	92,0%	Toner	Color	1.494
EPRT00566CMBRU	10.54.225.33	XVC01230	magenta	92,0%	Toner	Color	1.494
EPRT00566CMBRU	10.54.225.33	XVC01230	yellow	92,0%	Toner	Color	1.494
EPRT00567BMBRU	10.52.97.6	XXT00631	black	80,0%	Toner	B/W	564
EPRT00568CMBRU	10.55.33.5	XVC12855	black	97,0%	Toner	Color	2.639
EPRT00568CMBRU	10.55.33.5	XVC12855	cyan	97,0%	Toner	Color	2.639
EPRT00568CMBRU	10.55.33.5	XVC12855	magenta	97,0%	Toner	Color	2.639
EPRT00568CMBRU	10.55.33.5	XVC12855	yellow	98,0%	Toner	Color	2.639
ITECBRUC002	10.128.13.43	XVC01053	black	99,0%	Toner	Color	686
ITECBRUC002	10.128.13.43	XVC01053	cyan	99,0%	Toner	Color	686
ITECBRUC002	10.128.13.43	XVC01053	magenta	99,0%	Toner	Color	686
ITECBRUC002	10.128.13.43	XVC01053	yellow	99,0%	Toner	Color	686
ITECBRUCCANONPOC1	10.130.13.21	XXT00617	black	59,0%	Toner	B/W	6.810
ITECBRUCCANONPOC7	10.128.13.21	2JC01176	black	98,0%	Toner	Color	442
ITECBRUCCANONPOC7	10.128.13.21	2JC01176	cyan	99,0%	Toner	Color	442
ITECBRUCCANONPOC7	10.128.13.21	2JC01176	magenta	99,0%	Toner	Color	442
ITECBRUCCANONPOC7	10.128.13.21	2JC01176	yellow	99,0%	Toner	Color	442
ITECLUXCCANONPOC5	10.21.13.100	XXT00680	black	72,0%	Toner	B/W	2.921
SEC30CDA73D9921	192.168.36.209	ZDGSBJCFA001EVH	Black	20,0%	Toner	B/W	6.773
1015							

Consumable Status	Estimated Pages Remaining	Supply Pages	Average Pages/Day	Discovered	Product Number
In Use	14.419	12407	40	20/07/2018	
In Use	12.149	9606	31,2	20/07/2018	
In Use	20.425	5271	17,1	20/07/2018	
In Use	14.758	14463	46,2	20/07/2018	
In Use	19.259	8780	28,1	20/07/2018	
In Use	24.652	8780	28,1	20/07/2018	
In Use	17.560	8780	28,1	20/07/2018	
In Use		13	0	20/07/2018	
In Use		9	0	20/07/2018	
In Use		9	0	20/07/2018	
In Use		9	0	20/07/2018	
In Use	32.573	6137	20	20/07/2018	
In Use	11.346	4379	14	20/07/2018	
In Use	11.175	149	0,5	20/07/2018	
In Use	25.617	2252	7,2	20/07/2018	
In Use	32.693	1739	5,6	20/07/2018	
In Use	32.693	1739	5,6	20/07/2018	
In Use	26.955	1739	5,6	20/07/2018	
In Use	31.714	2413	7,8	20/07/2018	
In Use	35.340	1488	4,8	20/07/2018	
In Use	47.616	1488	4,8	20/07/2018	
In Use	27.974	1488	4,8	20/07/2018	
In Use	77	1	0	20/07/2018	
In Use	82.212	1054	3,4	20/07/2018	
In Use		297	1	20/07/2018	
In Use	48.118	491	1,6	20/07/2018	
In Use		211	0,7	20/07/2018	
In Use		211	0,7	20/07/2018	
In Use		211	0,7	20/07/2018	
In Use	26.558	271	0,9	20/07/2018	
In Use		140	0,5	20/07/2018	
In Use		140	0,5	20/07/2018	
In Use		140	0,5	20/07/2018	
In Use	18.260	7201	30,3	03/10/2018	
In Use	20.741	4926	20,7	03/10/2018	
In Use	22.167	4926	20,7	03/10/2018	
In Use	19.458	4926	20,7	03/10/2018	
In Use	11.344	9204	38,7	03/10/2018	
In Use	28.843	5560	23,4	03/10/2018	
In Use	25.020	5560	23,4	03/10/2018	
In Use	20.651	5560	23,4	03/10/2018	
In Use	6.043	24810	104,3	03/10/2018	
In Use	65.486	9899	41,6	03/10/2018	
In Use	60.101	9899	41,6	03/10/2018	
In Use	51.351	9899	41,6	03/10/2018	

In Use	19.366	9832	41,3	03/10/2018
In Use	23.891	5674	23,8	03/10/2018
In Use	21.075	5674	23,8	03/10/2018
In Use	18.749	5674	23,8	03/10/2018
Replaced	0	23931	100,6	03/10/2018
In Use	15.272	996	18,2	03/10/2018
In Use	20.596	14815	62,3	03/10/2018
In Use	23.782	14815	62,3	03/10/2018
In Use	13.944	14815	62,3	03/10/2018
In Use	17.636	8160	34,3	03/10/2018
In Use	29.875	4516	19	03/10/2018
In Use	32.741	4516	19	03/10/2018
In Use	27.419	4516	19	03/10/2018
In Use	11.417	19132	80,4	03/10/2018
In Use	31.192	10538	44,3	03/10/2018
In Use	23.116	10538	44,3	03/10/2018
In Use	23.116	10538	44,3	03/10/2018
In Use	26.890	2689	11,3	03/10/2018
In Use	35.293	1486	6,2	03/10/2018
In Use	35.293	1486	6,2	03/10/2018
In Use	47.552	1486	6,2	03/10/2018
In Use	13.224	10154	42,7	03/10/2018
In Use	13.054	6527	27,4	03/10/2018
In Use	15.755	6527	27,4	03/10/2018
In Use	14.317	6527	27,4	03/10/2018
Replaced	0	18672	78,5	03/10/2018
Replaced	0	18114	183,1	03/10/2018
In Use	25.760	1680	35	03/10/2018
In Use	3.118	22602	95	03/10/2018
In Use	2.009	22602	95	03/10/2018
In Use	1.202	22602	95	03/10/2018
In Use	38.073	785	3,4	03/10/2018
In Use	34.532	712	3,1	03/10/2018
In Use	13.386	712	3,1	03/10/2018
In Use	11.036	712	3,1	03/10/2018
In Use	2.934	19806	83,2	03/10/2018
In Use	14.162	12774	53,7	03/10/2018
In Use	12.513	12774	53,7	03/10/2018
In Use	9.352	12774	53,7	03/10/2018
Replaced	0	24605	103,4	03/10/2018
In Use	13.282	8412	133,8	03/10/2018
In Use	6.469	21758	91,4	03/10/2018
In Use	5.021	21758	91,4	03/10/2018
In Use	2.024	21758	91,4	03/10/2018
In Use	11.492	13320	56	03/10/2018

In Use	22.187	8012	33,7	03/10/2018
In Use	24.704	8012	33,7	03/10/2018
In Use	22.187	8012	33,7	03/10/2018
Replaced	0	20563	86,4	03/10/2018
In Use	15.185	2963	54	03/10/2018
In Use	12.525	15372	64,6	03/10/2018
In Use	10.601	15372	64,6	03/10/2018
In Use	10.161	15372	64,6	03/10/2018
Replaced	0	19091	80,2	03/10/2018
In Use	19.404	198	108	03/10/2018
In Use	11.563	13071	54,9	03/10/2018
In Use	9.803	13071	54,9	03/10/2018
In Use	8.278	13071	54,9	03/10/2018
In Use	21.928	4227	17,8	03/10/2018
In Use	29.245	2571	10,8	03/10/2018
In Use	33.790	2571	10,8	03/10/2018
In Use	29.245	2571	10,8	03/10/2018
In Use	30.599	2690	11,6	03/10/2018
In Use	38.333	1614	6,9	03/10/2018
In Use	38.333	1614	6,9	03/10/2018
In Use	38.333	1614	6,9	03/10/2018
In Use	10.750	13500	56,7	03/10/2018
In Use	21.035	8414	35,4	03/10/2018
In Use	23.624	8414	35,4	03/10/2018
In Use	21.035	8414	35,4	03/10/2018
In Use	17.399	11501	48,3	03/10/2018
In Use	19.811	7056	29,7	03/10/2018
In Use	24.696	7056	29,7	03/10/2018
In Use	23.315	7056	29,7	03/10/2018
Replaced	0	20732	87,1	03/10/2018
Replaced	0	21670	156	03/10/2018
In Use	7.042	10653	152,3	03/10/2018
In Use	5.458	27974	117,5	03/10/2018
In Use	3.179	27974	117,5	03/10/2018
In Use	3.179	27974	117,5	03/10/2018
Replaced	0	23362	98,2	03/10/2018
In Use	7.041	9388	119,1	03/10/2018
In Use	3.206	22445	94,3	03/10/2018
In Use	7.379	22445	94,3	03/10/2018
In Use	5.467	22445	94,3	03/10/2018
In Use	11.625	5552	23,3	03/10/2018
In Use	21.201	3492	14,7	03/10/2018
In Use	10.913	3492	14,7	03/10/2018
In Use	19.555	3492	14,7	03/10/2018
In Use		5179	96,3	05/04/2019

In Use	77.900	3075	191,7	13/05/2019
In Use	5.749	27418	115,2	03/10/2018
In Use	7.404	16218	68,1	03/10/2018
In Use	5.700	26058	109,5	03/10/2018
Replaced	0	40413	169,8	03/10/2018
In Use	3.739	15939	159,5	03/10/2018
In Use	4.267	32710	137,4	03/10/2018
In Use		5361	64	06/03/2019
In Use	4.968	17960	75,5	03/10/2018
In Use	13.537	6641	28,6	09/10/2018
In Use	11.501	11804	49,6	03/10/2018
In Use	15.363	4865	20,4	03/10/2018
In Use	43.659	2835	11,9	03/10/2018
In Use	14.028	13677	57,5	03/10/2018
In Use	12.653	13652	57,4	03/10/2018
In Use	20.854	5718	24	03/10/2018
In Use	15.962	7674	32,3	03/10/2018
In Use	16.780	4528	19,1	03/10/2018
In Use	18.800	5458	23,1	03/10/2018
In Use	34.631	2372	10	03/10/2018
In Use	6.167	33407	140,4	03/10/2018
In Use	6.546	31220	131,2	03/10/2018
In Use	41.847	2262	14,1	19/12/2018
In Use	4.145	37303	156,7	03/10/2018
In Use	19.704	3235	13,9	09/10/2018
In Use	5.930	21626	90,9	03/10/2018
In Use	13.965	11970	50,5	04/10/2018
Replaced	0	42099	176,9	03/10/2018
In Use	2.038	48409	358,7	03/10/2018
In Use	748	27682	116,3	03/10/2018
In Use	29.700	1980	8,3	03/10/2018
In Use	4.221	27859	117,1	03/10/2018
Replaced	0	40479	170,1	03/10/2018
In Use	4.957	30095	271,6	03/10/2018
Replaced	0	35011	147,1	03/10/2018
In Use	5.124	37148	337,6	03/10/2018
Replaced	0	43379	182,3	03/10/2018
Replaced	0	3907	34,6	03/10/2018
In Use	5.953	39381	382,6	03/10/2018
Replaced	0	47071	197,8	03/10/2018
In Use	8.290	21021	214,6	03/10/2018
Replaced	0	37118	156	03/10/2018
Replaced	0	45769	342	03/10/2018
Replaced	0	4736	157,4	03/10/2018
Replaced	0	2416	271	03/10/2018



In Use	36.630	370	370	03/10/2018	
Replaced	0	43128	181,2	03/10/2018	
In Use	3.157	49455	437,8	03/10/2018	
Replaced	0	36486	153,3	03/10/2018	
In Use	12.269	15978	172	03/10/2018	
In Use	57.275	725	14,6	09/04/2019	
Replaced	0	43270	181,8	03/10/2018	
In Use	26.702	12753	255,7	03/10/2018	
Replaced	0	31610	132,8	03/10/2018	
In Use	4.556	2047	225,4	03/10/2018	
In Use	6.706	36323	152,6	03/10/2018	
In Use	5.740	24106	101,3	03/10/2018	
In Use	5.828	32540	136,7	03/10/2018	
In Use	12.664	4925	20,7	03/10/2018	
In Use	5.191	26753	115,8	10/10/2018	
In Use	5.162	38430	165,6	09/10/2018	
In Use	15.298	12748	54,9	09/10/2018	
In Use	541	41642	179,5	09/10/2018	
In Use		19605	84,5	09/10/2018	
In Use	5.830	24873	107,2	09/10/2018	
In Use	6.904	34518	149,4	10/10/2018	
In Use	33.763	1777	7,7	10/10/2018	
In Use		14080	60,7	09/10/2018	
In Use	14.097	12722	55,1	10/10/2018	
In Use		13334	57,5	09/10/2018	
In Use		7703	33,2	09/10/2018	
In Use	6.397	32970	142,7	10/10/2018	
In Use	10.178	15759	68,2	10/10/2018	
In Use	5.822	31538	137,1	11/10/2018	
In Use	4.918	18749	81,5	11/10/2018	
In Use		19575	85,5	12/10/2018	
In Use	10.934	18587	80,8	11/10/2018	
In Use	8.734	18924	82,3	11/10/2018	
In Use	9.216	17749	77,2	11/10/2018	
In Use	15.121	8433	36,7	11/10/2018	
In Use	14.407	9809	42,6	11/10/2018	
In Use	16.695	10017	43,6	11/10/2018	
In Use	4.201	24153	105	11/10/2018	
In Use	22.267	5655	24,6	11/10/2018	
In Use	11.724	5309	23,1	11/10/2018	
In Use	19.242	10361	45	11/10/2018	
In Use	19.038	7682	33,4	11/10/2018	
In Use	9.262	3890	17,2	12/10/2018	
In Use	47.168	4523	19,5	09/10/2018	
In Use	1.164	21887	94,7	10/10/2018	

In Use	11.868	15456	66,9	10/10/2018
In Use	12.365	15456	66,9	10/10/2018
In Use	12.880	15456	66,9	10/10/2018
Replaced	0	24780	107,3	10/10/2018
In Use	17.788	4561	93,5	10/10/2018
In Use	1.020	19179	83	10/10/2018
In Use	4.855	19179	83	10/10/2018
In Use	3.976	19179	83	10/10/2018
In Use	1.491	28040	121,4	10/10/2018
In Use	14.705	16269	70,4	10/10/2018
In Use	13.557	16269	70,4	10/10/2018
In Use	9.297	16269	70,4	10/10/2018
In Use	3.347	20324	88	10/10/2018
In Use	15.755	13129	56,8	10/10/2018
In Use	15.755	13129	56,8	10/10/2018
In Use	11.395	13129	56,8	10/10/2018
In Use	23.723	1805	7,8	10/10/2018
In Use	39.200	1225	5,3	10/10/2018
In Use	29.094	1225	5,3	10/10/2018
In Use	39.200	1225	5,3	10/10/2018
In Use	9.248	15496	67,1	10/10/2018
In Use	20.701	9887	42,8	10/10/2018
In Use	18.079	9887	42,8	10/10/2018
In Use	14.583	9887	42,8	10/10/2018
In Use		22375	96,5	09/10/2018
In Use		14018	60,4	09/10/2018
In Use		14018	60,4	09/10/2018
In Use		14018	60,4	09/10/2018
In Use	1.204	22641	98	10/10/2018
In Use	6.673	14637	63,4	10/10/2018
In Use	11.710	14637	63,4	10/10/2018
In Use	15.552	14637	63,4	10/10/2018
In Use	14.876	9267	40,3	11/10/2018
In Use	24.706	5122	22,3	11/10/2018
In Use	28.683	5122	22,3	11/10/2018
In Use	26.570	5122	22,3	11/10/2018
In Use	16.606	5610	24,4	11/10/2018
In Use	14.270	3842	16,7	11/10/2018
In Use	19.930	3842	16,7	11/10/2018
In Use	17.289	3842	16,7	11/10/2018
In Use	5.323	29481	123,9	03/10/2018
In Use	13.920	14991	63	03/10/2018
In Use	19.529	9232	38,8	03/10/2018
In Use	24.763	1955	8,2	03/10/2018
In Use	22.055	9846	41,4	03/10/2018

In Use	21.132	11563	49,8	03/10/2018
In Use	8.028	17729	74,5	03/10/2018
In Use	9.690	10738	45,1	03/10/2018
In Use	15.463	7002	29,4	03/10/2018
In Use	1.080	35098	147,5	03/10/2018
In Use	11.966	9573	40,2	03/10/2018
In Use	21.380	4605	19,3	03/10/2018
In Use	42.732	4683	19,7	03/10/2018
In Use	21.592	1393	5,9	03/10/2018
In Use	33.902	699	2,9	03/10/2018
In Use	68.502	699	2,9	03/10/2018
In Use	22.368	699	2,9	03/10/2018
In Use	11.686	9702	40,8	03/10/2018
In Use	17.994	6079	25,5	03/10/2018
In Use	25.596	6079	25,5	03/10/2018
In Use	17.068	6079	25,5	03/10/2018
In Use	19.570	824	3,5	03/10/2018
In Use	35.378	361	1,5	03/10/2018
In Use	35.378	361	1,5	03/10/2018
In Use	35.378	361	1,5	03/10/2018
In Use	30.139	2679	11,3	03/10/2018
In Use	54.320	1120	4,7	03/10/2018
In Use	109.760	1120	4,7	03/10/2018
In Use	54.320	1120	4,7	03/10/2018
In Use	24.450	3784	15,9	03/10/2018
In Use	32.674	1738	7,3	03/10/2018
In Use	55.616	1738	7,3	03/10/2018
In Use	26.939	1738	7,3	03/10/2018
In Use	32.660	2130	9,4	03/10/2018
In Use	81.438	831	3,7	03/10/2018
In Use	81.438	831	3,7	03/10/2018
In Use	81.438	831	3,7	03/10/2018
In Use	7.353	11803	49,6	03/10/2018
In Use	26.445	6695	28,1	03/10/2018
In Use	34.730	6695	28,1	03/10/2018
In Use	19.817	6695	28,1	03/10/2018
In Use	30.660	7762	32,6	03/10/2018
In Use	76.380	3216	13,5	03/10/2018
In Use	102.912	3216	13,5	03/10/2018
In Use	60.461	3216	13,5	03/10/2018
In Use	17.528	3420	14,4	03/10/2018
In Use	25.392	1932	8,1	03/10/2018
In Use	21.977	1932	8,1	03/10/2018
In Use	19.320	1932	8,1	03/10/2018
In Use	27.265	1759	7,4	03/10/2018

In Use	48.694	1004	4,2	03/10/2018	
In Use	48.694	1004	4,2	03/10/2018	
In Use	32.128	1004	4,2	03/10/2018	
Replaced	0	15562	65,4	03/10/2018	
In Use	13.914	2715	57,8	03/10/2018	
In Use	10.640	12091	50,8	03/10/2018	
In Use	10.194	12091	50,8	03/10/2018	
In Use	9.998	12091	50,8	03/10/2018	
Replaced	0	17439	73,3	03/10/2018	
In Use	13.801	8236	100,8	03/10/2018	
In Use	5.916	17747	74,6	03/10/2018	
In Use	5.324	17747	74,6	03/10/2018	
In Use	3.786	17747	74,6	03/10/2018	
In Use	14.553	7511	31,6	03/10/2018	
In Use	24.485	4425	18,6	03/10/2018	
In Use	28.933	4425	18,6	03/10/2018	
In Use	26.550	4425	18,6	03/10/2018	
In Use	14.459	5658	23,8	03/10/2018	
In Use	21.126	3818	16	03/10/2018	
In Use	19.567	3818	16	03/10/2018	
In Use	16.969	3818	16	03/10/2018	
In Use	12.644	6934	29,1	03/10/2018	
In Use	24.872	3804	16	03/10/2018	
In Use	27.262	3804	16	03/10/2018	
In Use	19.496	3804	16	03/10/2018	
In Use	8.558	9319	39,2	03/10/2018	
In Use	21.190	6134	25,8	03/10/2018	
In Use	18.913	6134	25,8	03/10/2018	
In Use	15.335	6134	25,8	03/10/2018	
In Use	21.772	1914	8	03/10/2018	
In Use	22.485	1196	5	03/10/2018	
In Use	38.272	1196	5	03/10/2018	
In Use	28.405	1196	5	03/10/2018	
In Use	17.825	5704	24	03/10/2018	
In Use	36.662	3223	13,5	03/10/2018	
In Use	36.662	3223	13,5	03/10/2018	
In Use	28.685	3223	13,5	03/10/2018	
Replaced	0	36912	218,3	11/12/2018	
In Use	31.710	15855	318,2	11/12/2018	
In Use	19.177	8338	49,6	12/12/2018	
In Use	23.756	5642	33,6	12/12/2018	
In Use	25.389	5642	33,6	12/12/2018	
In Use	23.756	5642	33,6	12/12/2018	
In Use	9.619	3375	39,1	02/03/2019	
In Use	16.701	12306	73,2	12/12/2018	

In Use	20.737	8178	48,7	12/12/2018
In Use	24.207	8178	48,7	12/12/2018
In Use	24.207	8178	48,7	12/12/2018
In Use	24.650	7888	93	05/03/2019
In Use	54.919	4828	56,9	05/03/2019
In Use	48.280	4828	56,9	05/03/2019
In Use	48.280	4828	56,9	05/03/2019
In Use	11.893	1892	87	07/05/2019
In Use	12.892	2309	13,7	11/12/2018
In Use	8.549	8549	50,6	11/12/2018
In Use	27.048	276	1,6	11/12/2018
In Use	25.284	258	1,5	11/12/2018
In Use	25.284	258	1,5	11/12/2018
In Use	25.284	258	1,5	11/12/2018
In Use	19.763	5929	36,3	15/12/2018
In Use	7.708	12916	76,4	11/12/2018
In Use	8.621	9933	58,7	11/12/2018
In Use	14.052	9933	58,7	11/12/2018
In Use	11.920	9933	58,7	11/12/2018
In Use	27.101	2062	12,6	15/12/2018
In Use	29.178	1552	9,5	15/12/2018
In Use	29.178	1552	9,5	15/12/2018
In Use	20.398	1552	9,5	15/12/2018
In Use	8.852	11455	67,7	11/12/2018
In Use	10.974	6719	39,8	11/12/2018
In Use	12.818	4059	24	11/12/2018
In Use	24.314	4687	27,7	11/12/2018
In Use	25.048	3131	18,5	11/12/2018
In Use	27.866	3131	18,5	11/12/2018
In Use	27.866	3131	18,5	11/12/2018
In Use	14.504	4280	25,3	11/12/2018
In Use	7.388	9850	58,3	11/12/2018
In Use	4.795	3976	27,2	21/12/2018
In Use	15.448	10041	70,7	07/01/2019
In Use	30.978	6884	48,5	07/01/2019
In Use	28.985	6884	48,5	07/01/2019
In Use	27.192	6884	48,5	07/01/2019
In Use	21.737	2877	20,3	07/01/2019
In Use	13.457	8130	57,2	07/01/2019
In Use	3.453	29929	180,4	14/12/2018
In Use	22.525	2650	16,6	20/12/2018
In Use	12.016	11137	68,7	18/12/2018
In Use	4.815	33306	205,5	18/12/2018
In Use	11.085	13302	82	18/12/2018
In Use	18.747	8954	55,2	18/12/2018

In Use	20.594	8954	55,2	18/12/2018
In Use	18.747	8954	55,2	18/12/2018
In Use	6.356	27543	169,9	18/12/2018
In Use	4.342	18236	112,5	18/12/2018
In Use	22.938	3778	23,3	18/12/2018
In Use	31.609	2405	14,8	18/12/2018
In Use	37.278	2405	14,8	18/12/2018
In Use	31.609	2405	14,8	18/12/2018
In Use	4.111	16717	103,2	18/12/2018
In Use	21.327	7205	44,4	18/12/2018
In Use	25.816	4610	28,4	18/12/2018
In Use	30.497	4610	28,4	18/12/2018
In Use	19.411	4610	28,4	18/12/2018
In Use	19.380	9256	57,1	18/12/2018
In Use	13.377	5816	35,9	18/12/2018
In Use	16.330	5816	35,9	18/12/2018
In Use	16.330	5816	35,9	18/12/2018
In Use	17.172	11946	73,7	18/12/2018
Replaced	0	50399	311	18/12/2018
In Use	27.598	1162	200,6	18/12/2018
In Use	3.838	38926	240	18/12/2018
In Use	50.526	8842	54,5	18/12/2018
In Use	4.926	20032	123,7	18/12/2018
In Use	11.818	14182	87,5	18/12/2018
In Use	10.455	18296	112,8	18/12/2018
In Use	10.467	12060	74,4	18/12/2018
In Use	21.105	12060	74,4	18/12/2018
In Use	20.209	12060	74,4	18/12/2018
In Use	12.617	11404	70,4	18/12/2018
In Use	17.321	7531	46,5	18/12/2018
In Use	23.534	7531	46,5	18/12/2018
In Use	15.768	7531	46,5	18/12/2018
In Use	17.875	11619	71,7	18/12/2018
In Use	28.535	7224	44,6	18/12/2018
In Use	23.871	7224	44,6	18/12/2018
In Use	20.283	7224	44,6	18/12/2018
In Use	5.613	16838	103,9	18/12/2018
In Use	13.187	9322	56,1	14/12/2018
In Use	16.317	6435	38,7	14/12/2018
In Use	16.317	6435	38,7	14/12/2018
In Use	16.317	6435	38,7	14/12/2018
In Use		22583	135,9	14/12/2018
In Use	14.243	10682	64,4	14/12/2018
In Use	32.288	1722	107,3	13/05/2019
In Use	20.705	9002	54,2	14/12/2018

In Use	16.655	6568	39,5	14/12/2018	
In Use	24.395	6568	39,5	14/12/2018	
In Use	17.515	6568	39,5	14/12/2018	
In Use	5.359	25262	156,9	19/12/2018	
In Use	6.328	14858	91,6	18/12/2018	
In Use	31.583	5109	31,7	19/12/2018	
In Use	6.727	12013	74,6	19/12/2018	
In Use	12.228	14606	90,6	19/12/2018	
In Use	45.152	3808	44,9	05/03/2019	
In Use	8.516	11021	68,4	19/12/2018	
In Use	21.017	13661	84,9	19/12/2018	
In Use	16.407	7836	48,7	19/12/2018	
In Use	29.105	7836	48,7	19/12/2018	
In Use	13.131	7836	48,7	19/12/2018	
In Use	1.390	50735	314,9	19/12/2018	
In Use	10.823	15415	95,7	19/12/2018	
In Use	5.414	24751	153,7	19/12/2018	
In Use	14.897	8890	55,2	19/12/2018	
In Use	14.186	6168	38,3	19/12/2018	
In Use	20.381	6168	38,3	19/12/2018	
In Use	16.448	6168	38,3	19/12/2018	
In Use	8.362	14772	91,7	19/12/2018	
In Use	9.723	12501	77,6	19/12/2018	
In Use	22.986	5108	35	21/12/2018	
In Use	21.651	3566	24,4	21/12/2018	
In Use	31.737	3566	24,4	21/12/2018	
In Use	31.737	3566	24,4	21/12/2018	
In Use	10.010	260	3	02/03/2019	
In Use	21.159	3824	24,1	21/12/2018	
In Use	6.550	2243	14,1	21/12/2018	
In Use	14.838	2243	14,1	21/12/2018	
In Use	25.514	2243	14,1	21/12/2018	
In Use	23.712	312	2,2	21/12/2018	
In Use	7.638	5381	36,9	21/12/2018	
In Use	17.204	8217	51,8	21/12/2018	
In Use	9.769	6350	40	21/12/2018	
In Use	16.102	6350	40	21/12/2018	
In Use	5.739	6350	40	21/12/2018	
In Use	2.889	18003	123,3	21/12/2018	
In Use	16.796	1976	13,9	21/12/2018	
In Use	31.980	14052	96,4	21/12/2018	
In Use	12.078	12324	84,6	21/12/2018	
In Use	13.770	7203	49,4	21/12/2018	
In Use	23.801	7203	49,4	21/12/2018	
In Use	25.211	7203	49,4	21/12/2018	

In Use	3.766	16069	110,1	21/12/2018	
In Use	7.675	13283	83,7	21/12/2018	
In Use	24.399	5422	33,9	20/12/2018	
In Use	23.178	4139	25,8	20/12/2018	
In Use	27.381	4139	25,8	20/12/2018	
In Use	30.008	4139	25,8	20/12/2018	
In Use	14.168	8501	50,9	13/12/2018	
In Use	12.308	10257	61,7	14/12/2018	
In Use	1.537	38947	233	13/12/2018	
In Use	10.159	16826	101,4	13/12/2018	
Replaced	0	28896	173	13/12/2018	
In Use	16.905	7105	148,4	13/12/2018	
In Use	5.170	23266	139,3	13/12/2018	
In Use	11.112	23266	139,3	13/12/2018	
In Use	4.485	23266	139,3	13/12/2018	
In Use	28.791	4055	24,3	13/12/2018	
In Use	2.717	33510	200,5	13/12/2018	
In Use	4.766	24929	149,3	13/12/2018	
In Use	5.568	33916	204,1	13/12/2018	
Replaced	0	20068	143,3	09/01/2019	
In Use	17.764	1579	122,6	09/01/2019	
In Use		14740	105,3	09/01/2019	
In Use		14740	105,3	09/01/2019	
In Use		14740	105,3	09/01/2019	
Replaced	0	25533	153	13/12/2018	
In Use	17.543	6008	120,5	13/12/2018	
In Use	8.042	21444	128,5	13/12/2018	
In Use	8.884	21444	128,5	13/12/2018	
In Use	5.773	21444	128,5	13/12/2018	
In Use		23719	141,9	13/12/2018	
In Use	21.072	10941	65,5	13/12/2018	
In Use	7.858	15716	94,1	13/12/2018	
In Use	7.224	20282	121,4	13/12/2018	
In Use	7.823	13908	83,2	13/12/2018	
In Use	15.683	13908	83,2	13/12/2018	
In Use	10.071	13908	83,2	13/12/2018	
In Use	16.608	9911	59,3	13/12/2018	
In Use	11.794	7347	44	13/12/2018	
In Use	15.383	7347	44	13/12/2018	
In Use	12.311	7347	44	13/12/2018	
In Use	6.260	29065	174,1	13/12/2018	
Replaced	0	26914	161	13/12/2018	
In Use	13.140	10273	137,1	13/12/2018	
In Use	1.425	26788	160,2	13/12/2018	
In Use	5.164	26788	160,2	13/12/2018	



In Use	1.425	26788	160,2	13/12/2018	
Replaced	0	50294	301,2	13/12/2018	
In Use	33.225	3286	126	13/12/2018	
In Use	3.111	37852	226,6	13/12/2018	
In Use	29.583	1621	9,8	14/12/2018	
In Use	1.271	23898	143,9	14/12/2018	
In Use	11.651	17185	103,5	14/12/2018	
In Use	14.915	17185	103,5	14/12/2018	
In Use	9.820	17185	103,5	14/12/2018	
In Use	16.975	350	38,5	20/05/2019	
In Use	25.382	259	28,5	20/05/2019	
In Use	25.382	259	28,5	20/05/2019	
In Use	25.382	259	28,5	20/05/2019	
In Use	9.195	1642	75,1	07/05/2019	
In Use	16.558	1048	47,9	07/05/2019	
In Use	16.978	1048	47,9	07/05/2019	
In Use	16.978	1048	47,9	07/05/2019	
In Use	22.691	3554	40	01/03/2019	
In Use	28.158	2166	24,4	01/03/2019	
In Use	28.158	2166	24,4	01/03/2019	
In Use	24.368	2166	24,4	01/03/2019	
In Use	8.352	96	4,4	07/05/2019	
In Use		64	2,9	07/05/2019	
In Use		64	2,9	07/05/2019	
In Use		64	2,9	07/05/2019	
In Use	4.634	20388	127,4	20/12/2018	
In Use	25.570	5301	38,4	11/01/2019	
In Use	30.780	3078	22,3	11/01/2019	
In Use	40.454	3078	22,3	11/01/2019	
In Use	24.624	3078	22,3	11/01/2019	
In Use	5.257	11532	69,2	13/12/2018	
In Use	23.887	6431	38,6	13/12/2018	
In Use	36.014	6431	38,6	13/12/2018	
In Use	28.940	6431	38,6	13/12/2018	
In Use	14.965	10146	60,8	13/12/2018	
In Use	30.259	5833	35	13/12/2018	
In Use	38.588	5833	35	13/12/2018	
In Use	32.665	5833	35	13/12/2018	
In Use	20.018	3297	19,7	13/12/2018	
In Use	27.968	2128	12,7	13/12/2018	
In Use	40.006	2128	12,7	13/12/2018	
In Use	32.984	2128	12,7	13/12/2018	
In Use	13.351	12067	72,2	13/12/2018	
In Use	27.087	7739	46,3	13/12/2018	
In Use	32.585	7739	46,3	13/12/2018	

In Use	21.729	7739	46,3	13/12/2018
In Use	15.918	3300	20,3	18/12/2018
In Use	32.975	1754	10,8	18/12/2018
In Use	32.975	1754	10,8	18/12/2018
In Use	41.658	1754	10,8	18/12/2018
In Use	18.531	4118	24,7	12/12/2018
In Use	45.703	2431	14,6	12/12/2018
In Use	37.681	2431	14,6	12/12/2018
In Use	31.950	2431	14,6	12/12/2018
In Use	14.866	9663	57,6	12/12/2018
In Use	23.589	6351	37,8	12/12/2018
In Use	30.634	6351	37,8	12/12/2018
In Use	19.847	6351	37,8	12/12/2018
In Use		0	0	20/12/2018
In Use		0	0	20/12/2018
In Use		0	0	20/12/2018
In Use		0	0	20/12/2018
In Use	10.882	828	6,2	20/12/2018
In Use	20.864	652	4,9	20/12/2018
In Use	20.864	652	4,9	20/12/2018
In Use	15.485	652	4,9	20/12/2018
In Use	18.500	3047	19,1	20/12/2018
In Use	24.343	2140	13,4	20/12/2018
In Use	24.343	2140	13,4	20/12/2018
In Use	28.126	2140	13,4	20/12/2018
In Use	18.130	185	1,2	20/12/2018
In Use		88	0,5	20/12/2018
In Use		88	0,5	20/12/2018
In Use		88	0,5	20/12/2018
In Use	33.810	345	4,5	20/12/2018
In Use		194	2,5	20/12/2018
In Use		194	2,5	20/12/2018
In Use		194	2,5	20/12/2018
In Use	16.244	12473	75,1	14/12/2018
In Use	22.405	7980	48	14/12/2018
In Use	26.369	7980	48	14/12/2018
In Use	26.369	7980	48	14/12/2018
In Use	4.408	24685	148,6	14/12/2018
In Use	18.395	14716	88,6	14/12/2018
In Use	19.972	14716	88,6	14/12/2018
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In Use	8.396	22390	134,8	14/12/2018
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In Use	29.981	13668	82,3	14/12/2018

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In Use	6.633	16150	97,2	14/12/2018	
In Use	21.301	718	32,8	07/05/2019	
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In Use	25.687	8678	62,9	11/01/2019	

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In Use	2.961	11844	92,5	18/01/2019	
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In Use	11.912	9927	90,5	08/02/2019	
In Use	19.428	6217	56,6	08/02/2019	
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In Use		23	26,3	28/05/2019	
In Use		16	18,3	28/05/2019	
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In Use		16	18,3	28/05/2019	
In Use		26	29,7	28/05/2019	
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In Use				28/05/2019	
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In Use	3.417	51	58,3	28/05/2019	
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In Use	31.516	12286	146,6	06/03/2019	
In Use	33.499	2945	34,7	05/03/2019	
In Use	56.448	1764	20,8	05/03/2019	
In Use	41.895	1764	20,8	05/03/2019	
In Use	41.895	1764	20,8	05/03/2019	

In Use	32.340	2772	11,6	03/10/2018	
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In Use	26.190	270	1,1	03/10/2018	
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In Use	40.734	438	12,8	25/04/2019	
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In Use	31.913	329	36,2	20/05/2019	
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In Use		237	0,7	26/06/2018	
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In Use		72	0,8	26/02/2019	
In Use	24.360	2030	6	26/06/2018	
In Use		0	0	29/05/2019	

**From:** [REDACTED]  
**Sent:** 08 July 2019 15:33  
**To:** [REDACTED]  
**Cc:** [REDACTED]; European Data Protection Supervisor; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373

Dear [REDACTED]

In your previous correspondence you have said that 'The application owner is in contact with the solution provider (Canon) to obtain a complete diagram of the data flow of the ePrinting system'.

In our view, this information is very important to the analysis of this case file.

Therefore, in case you have received it, could you please provide us with that data flow diagram?

In case you have not yet received it, could you please inform us when are you expecting to receive that information?

Thank you in advance for your cooperation.

Kind regards,  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 June 2019 19:03  
**To:** [REDACTED]  
**Cc:** [REDACTED]; European Data Protection Supervisor ; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373

Dear [REDACTED]  
Thank you very much for your reply. We will analyse it and provide you with feedback asap.  
Kind regards,  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 June 2019 18:37  
**To:** [REDACTED]  
**Cc:** [REDACTED]; European Data Protection Supervisor ; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373

Dear [REDACTED]  
Thank you for your attention to the analysis of the document presented. We are pleased to answer your questions with the following explanations per point raised.

**1. Anonymous data**

The statistics carried out are based on standard requests where anonymous results have a minimum level of granularity per machine assigned to an organisational entity (e.g. a Directorate, a Unit, a Service). The data processed are the number and type of printed pages, the colorimetric mode (color, black and white) and the printing date. These are global statistics used to determine the most appropriate allocation of printing resources in terms of paper and printer cartridges.

Please find attached some examples of these global statistics.

**2. Complete diagram of the data flow**

The application owner is in contact with the solution provider (Canon) to obtain a complete diagram of the data flow of the ePrinting system.

**3. Data retention**

We mentioned 18 months since we were aware of an existing script exchanged with the European Commission to reduce the data retention period. However, we need now to reconsider this retention period since we have recently received a request from the Directorate-General for Personnel (DG PERS) of the European Parliament to keep personal data for a longer period to be used in inquiries and disciplinary cases. In the context of Article 86 of the Staff Regulations (and their Annex IX) and the general implementing provisions governing disciplinary proceedings and administrative investigations, DG PERS would propose the retention period of the discharge plus two years, given that no retention period is foreseen in those legal basis.

Your advice on this would be very useful.

**4. Data encryption**

As it is presented in the description of the processing, the HDD Data Encryption (using AES256-bit encryption) protects data stored on the hard disk.

At the software level, the Canon solution (uniFLOW) also uses AES 256-bit encryption to protect print job data while in transmission over the network. To protect print jobs from being output from an unattended device, the encrypted secured printing feature holds the job in a queue until the user releases the job using one of the agreed authentication methods. I hope these clarifications are useful, do not hesitate should you have any question or need further clarification.

Maria Castillejo



[REDACTED]  
European Parliament  
Directorate-General for Innovation and Technological Support  
[REDACTED]  
[www.europarl.europa.eu](http://www.europarl.europa.eu)

---

**From:** [REDACTED]  
**Sent:** 15 May 2019 17:29  
**To:** [REDACTED]  
**Cc:** [REDACTED]; European Data Protection Supervisor  
<[EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)>  
**Subject:** Request for information | 2019-0373

Dear [REDACTED]  
I hope this email finds you very well. I'm writing you regarding the informal consultation on the European Parliament's 'efficient printing' system (EDPS case file 2019-0373).  
We thank you for the additional information you provided by email on 17/04/2019.  
After the analysis of the documentation sent, we kindly ask you to clarify the following four points:

1. **Anonymous data**  
The personal data processing record states on page 3 that '[a]nonymised data will be used for statistical purposes in order to have a better overview of the paper and toner consumption'. Could you please provide additional details on what kind of anonymous data will you collect for statistical purposes and why you deem that such data should be considered anonymous. Is it, for example, 800 pages, toner consumption 50% on week 15?
2. **Complete diagram of the data flow**  
If available, could you please provide us with a complete diagram of the dataflow of the 'efficient printing' system.
3. **Data retention period**  
The personal data processing record states on page 5 that '[e]ncrypted records in databases (stored on the European Parliament servers) are generated during the processing operations. Personal data will be retained for a maximum of 18 months from the moment they are collected'. Could you please clarify the need for this data retention and what kind of personal data will be retained.
4. **Data encryption**  
You mention the type of encryption for the HDD data. Do you use the same encryption method (AES256-bit) for the other encrypted system?

We would appreciate if you could send us the information requested above by 11 June.

Thank you in advance for your collaboration.

Kind regards,



[REDACTED]  
[REDACTED]  
[REDACTED]  
**European Data Protection Supervisor**

Postal address: Rue Wiertz 60, B-1047 Brussels

Office address: Rue Montoyer 30, B-1000 Brussels

[@EU EDPS](#) [www.edps.europa.eu](http://www.edps.europa.eu)

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**From:** [REDACTED]  
**Sent:** 12 July 2019 15:56  
**To:** [REDACTED]  
**Cc:** [REDACTED] European Data Protection Supervisor; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373  
**Attachments:** MFD - Data flow glossary.xlsx; MFD - Data flow diagrams.pdf

Dear [REDACTED]  
We are pleased to share with you data flow diagrams that we received from Canon. These diagrams present data management per process: Logon process, End-user Print and Release, Mobile Print, Scanning process, Logoff process, Communication between each server and MFD.  
Please also find attached a glossary on the technical terms used.  
I hope these elements will provide you with sufficient information for the analysis.  
Please, do not hesitate should you have any question or need further clarification.  
Kind regards,



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Directorate-General for Innovation and Technological Support  
[REDACTED]  
[www.europarl.europa.eu](http://www.europarl.europa.eu)

---

**From:** [REDACTED]  
**Sent:** 08 July 2019 15:33  
**To:** [REDACTED]  
**Cc:** [REDACTED]; European Data Protection Supervisor ; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373  
Dear [REDACTED]

In your previous correspondence you have said that 'The application owner is in contact with the solution provider (Canon) to obtain a complete diagram of the data flow of the ePrinting system'.  
In our view, this information is very important to the analysis of this case file.  
Therefore, in case you have received it, could you please provide us with that data flow diagram?  
In case you have not yet received it, could you please inform us when are you expecting to receive that information?  
Thank you in advance for your cooperation.  
Kind regards,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 June 2019 19:03  
**To:** [REDACTED]  
**Cc:** [REDACTED] European Data Protection Supervisor <[EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)>; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373  
Dear [REDACTED]  
Thank you very much for your reply. We will analyse it and provide you with feedback asap.  
Kind regards,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 June 2019 18:37  
**To:** [REDACTED]  
**Cc:** [REDACTED]; European Data Protection Supervisor ; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373  
Dear [REDACTED]  
Thank you for your attention to the analysis of the document presented. We are pleased to answer your questions with the following explanations per point raised.

- 1. Anonymous data**  
The statistics carried out are based on standard requests where anonymous results have a minimum level of granularity per machine assigned to an organisational entity (e.g. a Directorate, a Unit, a Service). The data processed are the number and type of printed pages, the colorimetric mode (color, black and white) and the printing date. These are global statistics used to determine the most appropriate allocation of printing resources in terms of paper and printer cartridges. Please find attached some examples of these global statistics.
- 2. Complete diagram of the data flow**  
The application owner is in contact with the solution provider (Canon) to obtain a complete diagram of the data flow of the ePrinting system.
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We mentioned 18 months since we were aware of an existing script exchanged with the European Commission to reduce the data retention period. However, we need now to reconsider this retention period since we have recently received a request from the Directorate-General for Personnel (DG PERS) of the European Parliament to keep personal data for a longer period to be used in inquiries and disciplinary cases. In the context of Article 86 of the Staff Regulations (and their Annex IX) and the general implementing provisions governing disciplinary proceedings and administrative investigations, DG PERS would propose the retention period of the discharge plus two years, given that no retention period is foreseen in those legal basis.  
Your advice on this would be very useful.
- 4. Data encryption**  
As it is presented in the description of the processing, the HDD Data Encryption (using AES256-bit encryption) protects data stored on the hard disk.  
At the software level, the Canon solution (uniFLOW) also uses AES 256-bit encryption to protect print job data while in transmission over the network. To protect print jobs from being output from an unattended device, the encrypted secured printing feature holds the job in a queue until the user releases the job using one of the agreed authentication methods.  
I hope these clarifications are useful, do not hesitate should you have any question or need further clarification.  
Maria Castillejo



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European Parliament  
Directorate-General for Innovation and Technological Support  
[REDACTED]  
[www.europarl.europa.eu](http://www.europarl.europa.eu)

**From:** [REDACTED]  
**Sent:** 15 May 2019 17:29  
**To:** [REDACTED]  
**Cc:** [REDACTED] European Data Protection Supervisor  
<[EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)>  
**Subject:** Request for information | 2019-0373

Dear [REDACTED]

I hope this email finds you very well. I'm writing you regarding the informal consultation on the European Parliament's 'efficient printing' system (EDPS case file 2019-0373).

We thank you for the additional information you provided by email on 17/04/2019.

After the analysis of the documentation sent, we kindly ask you to clarify the following four points:

- 1. Anonymous data**  
The personal data processing record states on page 3 that '[a]nonymised data will be used for statistical purposes in order to have a better overview of the paper and toner consumption'. Could you please provide additional details on what kind of anonymous data will you collect for statistical purposes and why you deem that such data should be considered anonymous. Is it, for example, 800 pages, toner consumption 50% on week 15?
- 2. Complete diagram of the data flow**  
If available, could you please provide us with a complete diagram of the dataflow of the 'efficient printing' system.
- 3. Data retention period**  
The personal data processing record states on page 5 that '[e]ncrypted records in databases (stored on the European Parliament servers) are generated during the processing operations. Personal data will be retained for a maximum of 18 months from the moment they are collected'. Could you please clarify the need for this data retention and what kind of personal data will be retained.
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You mention the type of encryption for the HDD data. Do you use the same encryption method (AES256-bit) for the other encrypted system?

We would appreciate if you could send us the information requested above by 11 June.

Thank you in advance for your collaboration.

Kind regards,



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**European Data Protection Supervisor**  
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**From:** [REDACTED]  
**Sent:** 26 July 2019 18:08  
**To:** [REDACTED]  
**Cc:** [REDACTED] European Data Protection Supervisor; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373  
**Importance:** High

Dear [REDACTED]

We are writing to you concerning the EDPS informal consultation, opened on 16 April 2019, on the data processing regarding the European Parliament's (EP) 'efficient printing' system.

On September 2018, the EP announced the implementation of an 'efficient printing' system, which requires the EU staff to use their badge and introduce their computers user name and password, implying a personal data processing. On 8 February 2019, a complaint (case 2019-0149) was filed regarding the implementation of this 'efficient printing' system. It was agreed with the complainant to close the complaint provided that the EDPS follow-up the issue with a consultation.

After a meeting between the EDPS and EP staff on 4 April 2019, as well as subsequent exchange of information, the EDPS has analysed the data processing regarding the 'efficient printing' system.

#### I. **Legal analysis and recommendations**

This informal consultation analyses and highlights only those practices which do not seem to comply with the principles of the Regulation (EC) 2018/1725 (hereinafter 'the Regulation').

##### **Retention period**

According to the information provided, the data related to the user of the printer (e.g. user badge number, username, email address, printing job, etc.) will be stored in an encrypted form for 96 hours on the "current archives" following the creation of the printing jobs.

In addition, these data will be stored up to 18 months in an encrypted form in an EP server (the intermediate archive). In case of an investigation, personal data may be kept for a longer period.

Except if there is an on-going investigation on a concrete case, the EP has not provided factual elements that justify the retention of data for more than 96 hours. Additionally, the EDPS believes that storing all the printing and scanning information – which may contain personal data of the users – for 18 months is excessive.

Therefore, as a **general rule** and unless the EP provides additional arguments on this issue, we recommend that the **maximum retention period be 96 hours**. In the event of specific EU staff members being under investigation, the retention period can be extended until the completion of the investigation to preserve the evidence. However, this exception should be duly justified and documented.

##### **Data protection notice publication**

The EP published a data protection notice regarding this processing on the Intranet. After considering other possibilities – such as the data protection notice being displayed on posters close to the printers – the EP questioned the feasibility of those measures and requested advice from the EDPS.

The data protection notices should be visible to all data subjects prior to using the printing service. In that sense, the EDPS recommends that the **EP actively inform data subjects. One possibility would be to display a data protection notice next to all printers**. This way, the users will be able to read it and be informed before submitting their credentials. Other possibilities might be an e-mail to all staff informing them (for existing users); for newcomers, the EP could do this as part of their welcome package or by showing the notice on the printer's screen when a new badge is used the first time.

##### **Controller-Processor relationship**

According to the information provided and to our understanding, the EP is the controller and Canon is a processor in this data processing since they are processing data on behalf of the controller. However, this relationship is not reflected in the data protection records. Hence, we recommend that the **records be amended**, in order to include this controller–processor relationship.

In this regard, we would like to remind the EP that data processing by a processor shall be governed by a contract or other legal act, in accordance with Article 29(3) of the Regulation and the EDPS assume that the EP has signed such agreement (which includes strong provisions in relation to data protection) with all its processors involved in this printing system.

Additionally, the involvement of Neevia is also mentioned in the data processing flowcharts submitted to the EDPS, but the limited information provided does not allow us to assess if Neevia is a processor or a mere software provider. Therefore, we suggest that the EP analyse the role of Neevia in this data processing and adopt the necessary steps following that analysis to ensure full compliance with the Regulation.

Furthermore, we would like to highlight that one of the responsibilities of the controller is to use only processors providing sufficient guarantees to implement appropriate technical and organisational measures, in accordance with Article 29 of the Regulation.

##### **Technical and organisational measures**

###### a. **Data protection by design and by default**

Article 27 of the Regulation creates a new obligation in comparison to the previous data protection framework: data protection by design and by default. This means that the controller has to implement appropriate technical and organisational measures during both the development and the use of a data processing. This obligation exists independently of the obligation to conduct a data protection impact assessment (DPIA) in some cases.<sup>11</sup> In order to comply with the requirements of data protection by design and by default, the EP should perform a risk assessment that addresses the vulnerabilities and potential risks to the data subjects.

In this regard, data protection by design and by default also requires that the EP implement appropriate technical and organisational measures and safeguards on its servers and that special attention is paid not only the software installation, but also to future updates.

###### b. **General safeguards**

According to the information provided, this 'efficient printing' system is stored exclusively on internal EP servers with restricted access.

From the information provided, it is not clear how the EP links the badge ID and the user sessions for authentication in a request to print/scan a document. It is for the EP to ensure that any personal data processed here is minimised in accordance with the principle of data protection by design and by default.

Regarding the security measures, please note that some of the printed or scanned documents may contain special categories of data, whose unauthorised disclosure may cause significant harm to data subjects. We were not provided with enough information to make a global assessment, but we trust that the EP is aware of the sensitivity of the information at issue and that the necessary technical and organisational security measures are being adopted.

Moreover, the information provided does not state whether the EP assessed the threat of lost/stolen badges being used to retrieve pending print jobs. We suggest that the EP assess this risk, and if necessary, establish a quick procedure to block printing for lost or stolen badges.

###### c. **Encryption**

As it is presented in the description of the processing, the HDD Data Encryption (using AES 256-bit encryption) protects data stored on the hard disk in the server.

According to the information provided, '... the Canon solution (uniFLOW) also uses AES 256-bit encryption to protect print job data while in transmission over the network. To protect print jobs from being output from an unattended device, the encrypted secured printing feature holds the job in a queue until the user releases the job using one of the agreed authentication methods'.

The document is sent to the server without being encrypted. Then, it is encrypted. Encrypting the document using **end-to-end encryption** before sending it to the server would be safer. **We do not know whether the EP assessed this point in its information security risk assessment for the 'efficient printing' system and would recommend that it do so if it has not done so.**

##### **Conclusion**



We believe that if the EP effectively implements all the recommendations mentioned above, there is no reason to believe the EP data protection safeguards regarding the 'efficient printing' system are not appropriate.

Please inform the EDPS about the implementation of the above recommendations with the documentary evidence thereof within **three months** of the date of this message.

Please note that this is informal advice at staff level and does not prejudice any formal position that the EDPS might take. Should you need a formal reply (letter signed by Head of Unit or Supervisor), we can arrange that as well, but please note that it may take longer.

<sup>1</sup> The EDPS has issued a list of data processing subject to the DPIA obligation under Article 39(4) of the Regulation. Prima facie, it appears the 'efficient printing' system would not fall under this obligation. The list is available at: [https://edps.europa.eu/data-protection/our-work/publications/guidelines/data-protection-impact-assessment-list\\_en](https://edps.europa.eu/data-protection/our-work/publications/guidelines/data-protection-impact-assessment-list_en).

Yours sincerely,



[Redacted]  
[Redacted]  
**European Data Protection Supervisor**  
Postal address: Rue Wiertz 60, B-1047 Brussels  
Office address: Rue Montoyer 30, B-1000 Brussels  
[@EU\\_EDPS](#) [www.edps.europa.eu](http://www.edps.europa.eu)

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**From:** [Redacted]  
**Sent:** 12 July 2019 15:56  
**To:** [Redacted]  
**Cc:** [Redacted]; European Data Protection Supervisor ; [Redacted]  
**Subject:** RE: Request for information | 2019-0373

Dear [Redacted]

We are pleased to share with you data flow diagrams that we received from Canon.

These diagrams present data management per process: Logon process, End-user Print and Release, Mobile Print, Scanning process, Logoff process, Communication between each server and MFD.

Please also find attached a glossary on the technical terms used.

I hope these elements will provide you with sufficient information for the analysis.

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Kind regards,



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**European Parliament**  
Directorate-General for Innovation and Technological Support  
[Redacted]  
[www.europarl.europa.eu](http://www.europarl.europa.eu)

**From:** [Redacted]  
**Sent:** 08 July 2019 15:33  
**To:** [Redacted]  
**Cc:** [Redacted]; European Data Protection Supervisor ; [Redacted]  
**Subject:** RE: Request for information | 2019-0373

Dear [Redacted]

In your previous correspondence you have said that 'The application owner is in contact with the solution provider (Canon) to obtain a complete diagram of the data flow of the ePrinting system'.

In our view, this information is very important to the analysis of this case file.

Therefore, in case you have received it, could you please provide us with that data flow diagram?

In case you have not yet received it, could you please inform us when are you expecting to receive that information?

Thank you in advance for your cooperation.

Kind regards,

[Redacted]

**From:** [Redacted]  
**Sent:** 11 June 2019 19:03  
**To:** [Redacted]  
**Cc:** [Redacted]; European Data Protection Supervisor <[EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)>; [Redacted]  
**Subject:** RE: Request for information | 2019-0373

Dear [Redacted]

Thank you very much for your reply. We will analyse it and provide you with feedback asap.

Kind regards,

[Redacted]

**From:** [Redacted]  
**Sent:** 11 June 2019 18:37  
**To:** [Redacted]  
**Cc:** [Redacted]; European Data Protection Supervisor ; [Redacted]  
**Subject:** RE: Request for information | 2019-0373

Dear [Redacted]

Thank you for your attention to the analysis of the document presented. We are pleased to answer your questions with the following explanations per point raised.

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The statistics carried out are based on standard requests where anonymous results have a minimum level of granularity per machine assigned to an organisational entity (e.g. a Directorate, a Unit, a Service). The data processed are the number and type of printed pages, the colorimetric mode (color, black and white) and the printing date. These are global statistics used to determine the most appropriate allocation of printing resources in terms of paper and printer cartridges.

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Your advice on this would be very useful.

**4. Data protection**

#### 7. Data encryption

As it is presented in the description of the processing, the HDD Data Encryption (using AES256-bit encryption) protects data stored on the hard disk.

At the software level, the Canon solution (uniFLOW) also uses AES 256-bit encryption to protect print job data while in transmission over the network. To protect print jobs from being output from an unattended device, the encrypted secured printing feature holds the job in a queue until the user releases the job using one of the agreed authentication methods. I hope these clarifications are useful, do not hesitate should you have any question or need further clarification.



European Parliament  
Directorate-General for Innovation and Technological Support

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**From:** [REDACTED]  
**Sent:** 15 May 2019 17:29  
**To:** [REDACTED]  
**Cc:** [REDACTED] European Data Protection Supervisor  
<[EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)>  
**Subject:** Request for information | 2019-0373

Dear [REDACTED],  
I hope this email finds you very well. I'm writing you regarding the informal consultation on the European Parliament's 'efficient printing' system (EDPS case file 2019-0373).

We thank you for the additional information you provided by email on 17/04/2019.

After the analysis of the documentation sent, we kindly ask you to clarify the following four points:

- Anonymous data**  
The personal data processing record states on page 3 that '[a]nonymised data will be used for statistical purposes in order to have a better overview of the paper and toner consumption'. Could you please provide additional details on what kind of anonymous data will you collect for statistical purposes and why you deem that such data should be considered anonymous. Is it, for example, 800 pages, toner consumption 50% on week 15?
- Complete diagram of the data flow**  
If available, could you please provide us with a complete diagram of the dataflow of the 'efficient printing' system.
- Data retention period**  
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We would appreciate if you could send us the information requested above by 11 June.

Thank you in advance for your collaboration.

Kind regards,



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**From:** [REDACTED]  
**Sent:** 24 October 2019 19:56  
**To:** [REDACTED]  
**Cc:** [REDACTED] European Data Protection Supervisor; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373  
**Attachments:** Att 1 - Description of the processing - C\_1 - MFDs.pdf; Att 2 - Description of the processing - C\_1 - MFDs (signed).pdf; Att 3 - High risk pre-assessment DG ITEC - MFDs.pdf; Att 4 - 2019.10.11 - DPS - MFDs with authentication process.pdf; Att 5 - 2019.10.11 - DPN - MFDs with authentication process.pdf; Att 6 - Request to update the declaration within the DPO register.pdf

Dear [REDACTED]

First of all, thank you for the recommendations presented in your last email dated 26/07/2019. DG ITEC has taken note of the different points raised and analysed carefully the way to implement actions to meet the recommendations.

In this e-mail we will present **the current state of play on the measures implemented and planned**. We would also like take the opportunity to clarify the information previously provided and to explain future developments foreseen for the processing.

The multifunctional devices (MFDs) were installed to meet the objectives of the Parliamentary Project [ITEC P12] "Efficient printing" presented in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2017-2019. This project is going to evolve into a new Parliamentary Project "Needs-based printing in the digital age" presented in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2019-2021.

The objective is to reduce printing in the digital age. A key element of this project is to raise awareness at the individual level to meet the EMAS objectives on the reduction of paper and toner consumption hence to raise awareness on environmental impacts. Through this means, we expect to encourage users (data subjects) to reduce their impact on the environment when executing tasks in the context of their work relationship/mandate.

Please find below the requested answers and clarifications:

### **Retention period**

Please refer to the point 4.3 of the Record and/or the section "How long are the personal data kept?" of the Data Protection Statement (attached).

- Our services reviewed the retention periods rules in order to cover the different services managed by the multifunctional devices (MFDs) and to assess the future functionality related to the individual statistics on printing.
- As regards **the authentication process**:  
Personal data (i.e. Windows user ID, first name, last name, email) are synchronized (i.e. continuously collected and so updated [creation/erasure]) with the Windows directory services (corporate directory).
- **On the content of documents**:  
The MFDs do not analyse the content of the documents, do not store the content of the documents scanned/copied and do not store longer than 96 hours the content of the documents printed or to be printed (this time is to allow the data subject can launch or relaunch the print job(s) of his/her documents).
- **Concerning the activity logs used to produce global and individual statistics on printing processing operations**:
  - Records in databases are generated during the printing operations. These records include personal data only about paper and ink consumption (not on document content).
  - They are used for the global statistics (per machine assigned per entity).
  - They will be used for individual statistics on consumption (available for consultation purposes only to the concerned user).  
The individual statistics on consumption are in development. The users (data subjects) will be informed prior to the activation of this new feature. The individual statistics will be presented to the users via the provision of a user dashboard and/or user notifications. The purpose of this being to raise awareness on the user's individual impact on the environment. These records will be retained for a maximum of 18 months from the moment they are collected. Statistics will cover a sufficient period to present at least two scenarios of the same context and be able to compare these scenarios.
- **On the activity logs used for support/debugging purposes**:
  - There are different levels of logging available. In normal conditions, neither user information nor job information is recorded. However, at maximum level of logging (to debug an issue), the user identifier, the user name, the technical job identifier and the technical job name may be recorded depending on the nature of the issue.
  - All type of logs are kept for 30 days, except in case of an error where data are deleted after the issue is resolved or after 1 year if it comes first.
  - In case of an investigation (foreseen in the applicable Regulations to the EUIs and Internal Rules), the same retention period rules will apply. Personal data will be transferred directly to the competent authority for the investigation managing the relevant processing operation. They will apply the retention rules applicable to the purpose of their processing operation, which will be then out of the scope of DG ITEC.

### **Data protection notice publication**

- DG ITEC assessed different tools to provide the data subjects with updated information regarding the processing of their personal data. In this respect, there are ongoing discussions and tests with Canon (solution provider) to implement a functionality to present the full Data Protection Statement (via the MFDs) to the users (data subjects) prior to using the MFDs. This involves requesting an additional feature to the provider.
- As the project evolves, a new version of the Record adapted to the new features will be created and signed. Based on the elements declared in the Record, two communication tools will be presented to inform the data subject:
  - Data Protection Notices notifying the data subjects of the processing of personal data and inviting them to see the Data Protection Statement for further information on the processing (to be presented at least on the poster next to each machine and on the intranet pages presented the MFDs)
  - Data Protection Statement informing data subjects of all mandatory elements defined in Article 15 and Article 16 of Regulation (EU) 2018/1725 (to be presented at least on the intranet, on the user manual and in the MFDs).

- Finally, a communication campaign will be launched to inform the data subjects proactively on the processing of their personal data when using the printers and to present the upcoming functionalities related to the individual statistics.

## **Controller-Processor relationship**

- As presented in the Record, the European Parliament is the data controller. Due to security rules imposed by the European Parliament, Canon does not have access and cannot use the personal data. For this reason it is considered as a solution provider (software and hardware).
- DG ITEC sends only statistics per machine (without personal data) to Canon (e.g. for billing purposes).
- The MFDs use the Neevia application, set up and used locally (not connected), to convert documents into spool files. Neevia does not have access or cannot use the personal data, and is therefore considered as a software provider.

## **Technical and organisational measures**

### **a. Data protection by design and by default:**

- In order to comply with the obligation related to the Data protection by design and by default, the data controller in practice has included in the project cycles the notion of high-risk pre-assessment. Also called threshold assessment, it is performed as a prior analysis to decide if it is necessary to carry out a DPIA (Data Protection Impact Assessment) under Article 39 of the EU-DPR (Regulation [EU] 2018/1725).
- Please refer to the High-risk pre-assessment (threshold assessment) attached to this email.

The results of this high-risk pre-assessment are as follows:

1. Determination of applicability of an exclusion or derogation from conducting a DPIA
    - o Result: No exclusion or derogation applicable.
  2. Indicators for high risks
    - o Result: 1 indicator of high-risk is present in the processing (data processed on a large scale)
  3. Determination of applicability of an obligation to conduct a DPIA
    - o Result: No obligation applicable
  4. Conclusion presenting the final assessment taking into account the 3 previous parts
    - o Result: 1 indicator of high-risk is present in the processing (data processed on a large scale). Furthermore, this type of risk is accepted due to the context and purpose of the processing. Indeed, the MFDs support for the data subjects to execute basic and necessary tasks in the context of their work relationship/mandate.
- Therefore, no high-risks have been identified following this High-risk pre-assessment. However, an assessment will have to be conducted again every time there is a change on the MFDs that may have an impact for the data subjects.

### **b. General safeguards**

- During the first connection with the MFDs, the data subject has to register the EP badge that will be linked to his/her MFDs account (ID and password from the EP LDAP are required).  
The login data (i.e. Windows user ID, first name, last name, email) are then synchronized (i.e. continuously collected and so updated) with the Windows directory services (corporate directory) to ensure a secure authentication process.
- Thus, if there is a loss or the theft of a badge, the data subject can inform the HelpDesk that will notify directly DG SAFE, which will deactivate or block the badge without delay. The MFDs systems do not accept a deactivated or blocked badge. DG SAFE launches immediately the process to create a new badge when they are notified of loss or theft of a badge. The badge of the data subject will be linked directly to his/her new MFDs account. He/she will need to restart the authentication process (first authentication).

### **c. Encryption**

- The HDD Data Encryption uses AES256-bit length encryption keys. This ensures that the data stored on the hard disk are protected against leakage of confidential information by theft of the hard disk.
- Data are encrypted for the printing, scanning and copying. The end-to-end encryption will depend on all terminals used:
  - The MFDs are all encrypted.
  - The EP servers used in the solution are all encrypted. The print server spool file encryption protects files spooled to await on servers.
  - The terminal of the user (i.e. if the PC, mobile phone, tablet [sending the document to be printed or receiving the document scanning]), knowing that
    - o The corporate terminals are all encrypted (desktop, laptop, hybrid)
    - o The personal devices cannot be connected to UniFlow (MFDs software solution).

I hope these clarifications are useful, do not hesitate should you have any question or need further clarification.

██████████  
Data Protection Coordinator DG ITEC



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**From:** [REDACTED]  
**Sent:** 01 August 2019 07:55  
**To:** [REDACTED]  
**Cc:** [REDACTED]; European Data Protection Supervisor  
**Subject:** RE: Request for information | 2019-0373

Dear [REDACTED]

Thank you very much for your analysis and recommendations.  
On behalf of Maria Castillejo, I acknowledge receipt of your email dated 26 July 2019.  
We will analyse it and provide you with a reply within three months as presented in your conclusion.

Yours sincerely,



[REDACTED]  
**European Parliament**  
Innovation and Technological Support  
Innovation and Resources  
Innovation, Performance and Internal Control

[REDACTED]  
[www.europarl.europa.eu](http://www.europarl.europa.eu)

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**From:** [REDACTED]  
**Sent:** 26 July 2019 18:08  
**To:** [REDACTED]  
**Cc:** [REDACTED]; European Data Protection Supervisor ; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373  
**Importance:** High

Dear [REDACTED]

We are writing to you concerning the EDPS informal consultation, opened on 16 April 2019, on the data processing regarding the European Parliament's (EP) 'efficient printing' system.

On September 2018, the EP announced the implementation of an 'efficient printing' system, which requires the EU staff to use their badge and introduce their computers user name and password, implying a personal data processing. On 8 February 2019, a complaint (case 2019-0149) was filed regarding the implementation of this 'efficient printing' system. It was agreed with the complainant to close the complaint provided that the EDPS follow-up the issue with a consultation.

After a meeting between the EDPS and EP staff on 4 April 2019, as well as subsequent exchange of information, the EDPS has analysed the data processing regarding the 'efficient printing' system.

#### I. Legal analysis and recommendations

This informal consultation analyses and highlights only those practices which do not seem to comply with the principles of the Regulation (EC) 2018/1725 (hereinafter 'the Regulation').

### Retention period

According to the information provided, the data related to the user of the printer (e.g. user badge number, username, email address, printing job, etc.) will be stored in an encrypted form for 96 hours on the "current archives" following the creation of the printing jobs.

In addition, these data will be stored up to 18 months in an encrypted form in an EP server (the intermediate archive). In case of an investigation, personal data may be kept for a longer period.

Except if there is an on-going investigation on a concrete case, the EP has not provided factual elements that justify the retention of data for more than 96 hours. Additionally, the EDPS believes that storing all the printing and scanning information – which may contain personal data of the users – for 18 months is excessive.

Therefore, as a **general rule** and unless the EP provides additional arguments on this issue, we recommend that the **maximum retention period be 96 hours**. In the event of specific EU staff members being under investigation, the retention period can be extended until the completion of the investigation to preserve the evidence. However, this exception should be duly justified and documented.

#### 2. Data protection notice publication

The EP published a data protection notice regarding this processing on the Intranet. After considering other possibilities – such as the data protection notice being displayed on posters close to the printers – the EP questioned the feasibility of those measures and requested advice from the EDPS.

The data protection notices should be visible to all data subjects prior to using the printing service. In that sense, the EDPS recommends that the **EP actively**

**inform data subjects. One possibility would be to display a data protection notice next to all printers.** This way, the users will be able to read it and be informed before submitting their credentials. Other possibilities might be an e-mail to all staff informing them (for existing users); for newcomers, the EP could do this as part of their welcome package or by showing the notice on the printer's screen when a new badge is used the first time.

### 3. Controller-Processor relationship

According to the information provided and to our understanding, the EP is the controller and Canon is a processor in this data processing since they are processing data on behalf of the controller. However, this relationship is not reflected in the data protection records. Hence, we recommend that the **records be amended**, in order to include this controller–processor relationship.

In this regard, we would like to remind the EP that data processing by a processor shall be governed by a contract or other legal act, in accordance with Article 29(3) of the Regulation and the EDPS assume that the EP has signed such agreement (which includes strong provisions in relation to data protection) with all its processors involved in this printing system.

Additionally, the involvement of Neevia is also mentioned in the data processing flowcharts submitted to the EDPS, but the limited information provided does not allow us to assess if Neevia is a processor or a mere software provider. Therefore, we suggest that the EP analyse the role of Neevia in this data processing and adopt the necessary steps following that analysis to ensure full compliance with the Regulation.

Furthermore, we would like to highlight that one of the responsibilities of the controller is to use only processors providing sufficient guarantees to implement appropriate technical and organisational measures, in accordance with Article 29 of the Regulation.

### 4. Technical and organisational measures

#### a. Data protection by design and by default

Article 27 of the Regulation creates a new obligation in comparison to the previous data protection framework: data protection by design and by default. This means that the controller has to implement appropriate technical and organisational measures during both the development and the use of a data processing. This obligation exists independently of the obligation to conduct a data protection impact assessment (DPIA) in some cases.<sup>[1]</sup> In order to comply with the requirements of data protection by design and by default, the EP should perform a risk assessment that addresses the vulnerabilities and potential risks to the data subjects.

In this regard, data protection by design and by default also requires that the EP implement appropriate technical and organisational measures and safeguards on its servers and that special attention is paid not only to the software installation, but also to future updates.

#### b. General safeguards

According to the information provided, this 'efficient printing' system is stored exclusively on internal EP servers with restricted access.

From the information provided, it is not clear how the EP links the badge ID and the user sessions for authentication in a request to print/scan a document. It is for the EP to ensure that any personal data processed here is minimised in accordance with the principle of data protection by design and by default.

Regarding the security measures, please note that some of the printed or scanned documents may contain special categories of data, whose unauthorised disclosure may cause significant harm to data subjects. We were not provided with enough information to make a global assessment, but we trust that the EP is aware of the sensitivity of the information at issue and that the necessary technical and organisational security measures are being adopted.

Moreover, the information provided does not state whether the EP assessed the threat of lost/stolen badges being used to retrieve pending print jobs. We suggest that the EP assess this risk, and if necessary, establish a quick procedure to block printing for lost or stolen badges.

#### c. Encryption

As it is presented in the description of the processing, the HDD Data Encryption (using AES 256-bit encryption) protects data stored on the hard disk in the server.

According to the information provided, '... the Canon solution (uniFLOW) also uses AES 256-bit encryption to protect print job data while in transmission over the network. To protect print jobs from being output from an unattended device, the encrypted secured printing feature holds the job in a queue until the user releases the job using one of the agreed authentication methods'.

The document is sent to the server without being encrypted. Then, it is encrypted. Encrypting the document using **end-to-end encryption** before sending it to the server would be safer. **We do not know whether the EP assessed this point in its information security risk assessment for the 'efficient printing' system and would recommend that it do so if it has not done so.**

## II. Conclusion

We believe that if the EP effectively implements all the recommendations mentioned above, there is no reason to believe the EP data protection safeguards regarding the 'efficient printing' system are not appropriate.

Please inform the EDPS about the implementation of the above recommendations with the documentary evidence thereof within **three months** of the date of this message.

Please note that this is informal advice at staff level and does not prejudice any formal position that the EDPS might take. Should you need a formal reply (letter signed by Head of Unit or Supervisor), we can arrange that as well, but please note that it may take longer.

<sup>1</sup> The EDPS has issued a list of data processing subject to the DPIA obligation under Article 39(4) of the Regulation. Prima facie, it appears the 'efficient printing' system would not fall under this obligation. The list is available at: [https://edps.europa.eu/data-protection/our-work/publications/guidelines/data-protection-impact-assessment-list\\_en](https://edps.europa.eu/data-protection/our-work/publications/guidelines/data-protection-impact-assessment-list_en).

Yours sincerely,



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**From:** [REDACTED]  
**Sent:** 12 July 2019 15:56  
**To:** [REDACTED]  
**Cc:** [REDACTED] European Data Protection Supervisor <[EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)>; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373

Dear [REDACTED],

We are pleased to share with you data flow diagrams that we received from Canon. These diagrams present data management per process: Logon process, End-user Print and Release, Mobile Print, Scanning process, Logoff process, Communication between each server and MFD. Please also find attached a glossary on the technical terms used. I hope these elements will provide you with sufficient information for the analysis. Please, do not hesitate should you have any question or need further clarification. Kind regards,



[REDACTED]  
European Parliament  
Directorate-General for Innovation and Technological Support  
[REDACTED]  
[www.europarl.europa.eu](http://www.europarl.europa.eu)

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**From:** [REDACTED]  
**Sent:** 08 July 2019 15:33  
**To:** [REDACTED]  
**Cc:** [REDACTED]; European Data Protection Supervisor ; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373

Dear [REDACTED],  
In your previous correspondence you have said that 'The application owner is in contact with the solution provider (Canon) to obtain a complete diagram of the data flow of the ePrinting system'. In our view, this information is very important to the analysis of this case file. Therefore, in case you have received it, could you please provide us with that data flow diagram? In case you have not yet received it, could you please inform us when are you expecting to receive that information? Thank you in advance for your cooperation. Kind regards,  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 June 2019 19:03  
**To:** [REDACTED]  
**Cc:** [REDACTED] European Data Protection Supervisor <[EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)>; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373

Dear [REDACTED],  
Thank you very much for your reply. We will analyse it and provide you with feedback asap.  
Kind regards,  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 June 2019 18:37  
**To:** [REDACTED]  
**Cc:** [REDACTED]; European Data Protection Supervisor ; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373

Dear [REDACTED],  
Thank you for your attention to the analysis of the document presented. We are pleased to answer your questions with the following explanations per point raised.

- 1. Anonymous data**  
The statistics carried out are based on standard requests where anonymous results have a minimum level of granularity per machine assigned to an organisational entity (e.g. a Directorate, a Unit, a Service). The data processed are the number and type of printed pages, the colorimetric mode (color, black and white) and the printing date. These are global statistics used to determine the most appropriate allocation of printing resources in terms of paper and printer cartridges. Please find attached some examples of these global statistics.
- 2. Complete diagram of the data flow**  
The application owner is in contact with the solution provider (Canon) to obtain a complete diagram of the data flow of the ePrinting system.
- 3. Data retention**  
We mentioned 18 months since we were aware of an existing script exchanged with the European Commission to reduce

the data retention period. However, we need now to reconsider this retention period since we have recently received a request from the Directorate-General for Personnel (DG PERS) of the European Parliament to keep personal data for a longer period to be used in inquiries and disciplinary cases. In the context of Article 86 of the Staff Regulations (and their Annex IX) and the general implementing provisions governing disciplinary proceedings and administrative investigations, DG PERS would propose the retention period of the discharge plus two years, given that no retention period is foreseen in those legal basis.

Your advice on this would be very useful.

#### 4. Data encryption

As it is presented in the description of the processing, the HDD Data Encryption (using AES256-bit encryption) protects data stored on the hard disk.

At the software level, the Canon solution (uniFLOW) also uses AES 256-bit encryption to protect print job data while in transmission over the network. To protect print jobs from being output from an unattended device, the encrypted secured printing feature holds the job in a queue until the user releases the job using one of the agreed authentication methods.

I hope these clarifications are useful, do not hesitate should you have any question or need further clarification.

Maria Castillejo



European Parliament

Directorate-General for Innovation and Technological Support

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**From:** [REDACTED]

**Sent:** 15 May 2019 17:29

**To:** [REDACTED]

**Cc:** [REDACTED] European Data Protection Supervisor <[EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)>

**Subject:** Request for information | 2019-0373

Dear [REDACTED],

I hope this email finds you very well. I'm writing you regarding the informal consultation on the European Parliament's 'efficient printing' system (EDPS case file 2019-0373).

We thank you for the additional information you provided by email on 17/04/2019.

After the analysis of the documentation sent, we kindly ask you to clarify the following four points:

1. **Anonymous data**

The personal data processing record states on page 3 that '[a]nonymised data will be used for statistical purposes in order to have a better overview of the paper and toner consumption'. Could you please provide additional details on what kind of anonymous data will you collect for statistical purposes and why you deem that such data should be considered anonymous. Is it, for example, 800 pages, toner consumption 50% on week 15?

2. **Complete diagram of the data flow**

If available, could you please provide us with a complete diagram of the dataflow of the 'efficient printing' system.

3. **Data retention period**

The personal data processing record states on page 5 that '[e]ncrypted records in databases (stored on the European Parliament servers) are generated during the processing operations. Personal data will be retained for a maximum of 18 months from the moment they are collected'. Could you please clarify the need for this data retention and what kind of personal data will be retained.

4. **Data encryption**

You mention the type of encryption for the HDD data. Do you use the same encryption method (AES256-bit) for the other encrypted system?

We would appreciate if you could send us the information requested above by 11 June.

Thank you in advance for your collaboration.

Kind regards,



[REDACTED]

**European Data Protection Supervisor**

Postal address: Rue Wiertz 60, B-1047 Brussels

Office address: Rue Montoyer 30, B-1000 Brussels

[@EU\\_EDPS](https://twitter.com/EU_EDPS) [www.edps.europa.eu](http://www.edps.europa.eu)

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[\[1\]](https://edps.europa.eu/data-protection/our-work/publications/guidelines/data-protection-impact-assessment-list_en) The EDPS has issued a list of data processing subject to the DPIA obligation under Article 39(4) of the Regulation. Prima facie, it appears the 'efficient printing' system would not fall under this obligation. The list is available at: [https://edps.europa.eu/data-protection/our-work/publications/guidelines/data-protection-impact-assessment-list\\_en](https://edps.europa.eu/data-protection/our-work/publications/guidelines/data-protection-impact-assessment-list_en).



## Data Protection - DG ITEC Record of processing activity

### Description of personal data processing

**Purpose:** This file presents a detailed description of a personal data processing. **Such description has to be included in the Record file** in the context of the Accountability principle laid down in Article 4(2) of Regulation (EU) 2018/1725. Please refer to Article 31 of Regulation (EU) 2018/1725 presenting the requirements on Records of processing activities.

**By signing this document, the “Data Controller in practice” of the processing declares the accuracy of the statements and undertakes to update any change affecting this information.**

Nr.	Item	Description
<b>1. GENERAL INFORMATION</b>		
<b>1.1</b>	Record reference	<a href="#">DG-ITEC/C/1</a>
<b>1.2</b>	Record creation date	10/01/2019
<b>1.3</b>	Record last updated	11/10/2019
<b>1.4</b>	Record language	<input checked="" type="checkbox"/> English / <input type="checkbox"/> French
<b>1.5</b>	Name of the personal data processing <i>(ideally referring to a <b>business process</b>)</i>	<b>Multifunctional devices (MFDs) for printing, copying and scanning with authentication process</b>
<b>1.6</b>	Frame of reference of the personal data processing	<input type="checkbox"/> Business process basis <i>(Set of related structured activities/tasks producing a specific service/product)</i> <input type="checkbox"/> Programme basis <i>(Set of related projects managed in a coordinated manner)</i> <input type="checkbox"/> Project basis <input checked="" type="checkbox"/> Application basis
<b>1.7</b>	Short description of the context of the processing	<p>The multifunctional devices (MFDs) are installed to meet the objectives of the Parliamentary Project [ITEC P12] "Efficient printing" presented in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2017-2019, of the Parliamentary Project "Needs-based printing in the digital age" in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2019-2021 as well as the EMAS objectives (reduction of paper, toner and electricity consumption for IT equipment).</p> <p>The MFDs provides support for the employees/MEPs to execute basic and necessary tasks in the context of their work relationship/mandate.</p>
<b>1.8</b>	Name and contact details of the Data Controller  <i><b>Data Controller:</b> Union institution or body or the directorate-general or any other organisational entity which determines the purposes and means of the processing of personal data. =&gt; MAKE DECISIONS ON THE PROCESSING =&gt; ACCOUNTABLE [Answerable for actions, decisions and performance]</i>	<a href="#">European Parliament</a> <b>Brussels (Belgium)</b> Postal address: Rue Wiertz 60, B-1047 - Brussels, Belgium Telephone: +32 2 284 20 05 Email: <a href="mailto:epbrussels@europarl.europa.eu">epbrussels@europarl.europa.eu</a>

Nr.	Item	Description
1.9	<p>Name and contact details of the Data “Controller in practice” (internal controller)</p> <p><b>Data “Controller in practice”:</b>  <i>Responsible of the processing on behalf of the data controller, which determines the purposes and means of the processing of personal data. This person should be the Business, Project or the Application Owner. This role should be held at least at the Unit level or at the Directorate or Directorate-General level depending on the scope of the processing operation.</i>  =&gt; MAKE DECISIONS ON THE PROCESSING  =&gt; RESPONSIBLE [Obligation to act and take decisions to achieve required outcome]</p>	<p>Name: [REDACTED]  Organisational entity: DG ITEC/EDIT/PRINTING  Position: Head of Unit - PRINTING Unit (under Directorate for Publishing &amp; Distribution)  Email: [REDACTED]</p>
1.10	Name and contact details of the Data Protection Officer	<p><b>European Parliament Data Protection Officer</b>  Postal address: KAD 06A001, 2 rue Alcide De Gasperi, L-2929 - Luxembourg, Luxembourg  Telephone: +32 2 284 20 05  Email: <a href="mailto:data-protection@europarl.europa.eu">data-protection@europarl.europa.eu</a></p>
1.11	<p>Name and contact details of joint controller (where applicable)</p> <p><b>Joint Controller(s):</b>  <i>Where two or more data controllers jointly determine the purposes and means of processing, they shall be joint controllers. They determine in a transparent manner their respective responsibilities for compliance with their data protection obligations by means of an arrangement between them (unless determined by Union or Member State law).</i>  =&gt; MAKE DECISIONS ON THE PROCESSING  =&gt; SHARED ACCOUNTABILITY [Answerable for actions, decisions and performance]</p>	N/A
1.12	<p>Name and contact details of processor (where applicable)</p> <p><b>Processor:</b>  <i>Natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.</i>  =&gt; FOLLOW DECISIONS AND INSTRUCTIONS OF THE DATA CONTROLLER IN WRITING</p>	<p>N/A  Machines are leased, so every intervention (Upgrade and maintenance of the solution) on the machines have to be made by the provider (Canon). External persons do not have access to personal data present in production (only to anonymised data).</p>
1.13	Functional mailbox for enquiries on processing of personal data (to be preferably used)	<a href="mailto:efficient_printing@ep.europa.eu">efficient_printing@ep.europa.eu</a>

Nr.	Item	Description
<b>2. PURPOSE AND LEGAL BASIS OF PROCESSING</b> <i>Personal data must be processed only for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes.</i>		
2.1	Purpose of this processing of personal data <i>Why personal data are used?</i> <i>What are the global features?</i> <i>What are the opportunities or the outcome of their use?</i>	<p>The multifunctional devices (MFDs) use personal data to provide more efficiency (for the printing / scanning / copying usage). They give the possibility to send jobs for printing (files to print) from PCs or mobile devices. The MFDs use also personal data to provide more security (e.g. higher level of protection for the printed documents) as well as to raise awareness on the paper and ink consumptions, in order to reduce the environmental impacts.</p> <p><b>About the user interface:</b>            These devices require user authentication to avoid physical interception of documents:</p> <ul style="list-style-type: none"> <li>– For the first time: necessity to register the EP badge (ID and password from the EP LDAP required),</li> <li>– For the next times: necessity to scan the EP badge.</li> </ul> <p>After scanning their EP badge on the MFDs, the data subjects (users) have access to different parameters where they can choose to modify, print or delete files (previously sent to the printer) or to scan or copy files.</p> <p><b>About the necessary use of personal data:</b>            Content of documents of printing/scanning/copying jobs is processed only in order to print/scan/copy the documents themselves. The content of documents of scanning and copying jobs is not stored. The content of the documents of printing jobs (documents printed or to be printed) is stored no longer than 96 hours (which is the time where the data subject can launch or relaunch the print of his/her documents).</p> <p>Log-in data and activity logs (also personal data) are processed only to enable each user to be authenticated for the printing of their documents, for support/debugging purposes and for statistical purposes (i.e. global and individual statistics). The global statistics refer to the reports aggregated per machine assigned to an entity (e.g. Unit, Directorate). The individual statistics refer to the personal consumption reports made available for consultation purposes only to the concerned user (raise awareness individually on environmental impact).</p> <p><b>About security:</b>            The MFDs improve:</p> <ul style="list-style-type: none"> <li>– The protection for confidential documents (i.e. the printing of documents only happens after the user authenticates at the machine, to avoid exposing them on a machine).</li> <li>– The security of the IT systems, because the solution restricts unauthorised access to the MFDs. The print/scan/copy services are made available only to the authorised personnel based on authentication.</li> </ul> <p><b>About the global and individual statistics (only on the consumption, not on the content):</b></p> <ul style="list-style-type: none"> <li>– The MFDs aggregates printing consumption information and produce global statistics (aggregated per machine assigned to an entity) that will be used to determine the appropriate allocation of printing resources according to the business needs across the buildings. Therefore, such data will</li> </ul>

Nr.	Item	Description
		<p>be used for reporting to enforce a corporate printing strategy, for instance to reduce the number of colour and simplex printed pages.</p> <ul style="list-style-type: none"> <li>- The MFDs will produce as well individual and personal printing statistics [NB: future feature] that will be made available for consultation to each individual user. This is an EMAS objective (the users must receive access to personal printing statistics in order to raise their awareness about the ecological impact of their printing activities). The goal is to encourage each user (data subject) to reduce his/her impact on the environment. Such data will be reported (for consultation purposes) only to the concerned user (data subject) via a specific web portal accessible upon authentication.</li> </ul> <p><b>About the reporting:</b></p> <p>The following aggregated reports will be automatically generated on demand and presented to the managers of Efficient Printing to evaluate the performance of the strategy:</p> <ul style="list-style-type: none"> <li>- Consumption reporting per entity (Service, Unit and Directorate)</li> <li>- Consumption: black&amp;white vs colour (per entity)</li> <li>- Consumption: simplex vs duplex (per entity)</li> <li>- Consumption reports per individual machine</li> <li>- Consumption reports per machine category (model)</li> <li>- Ecological reports</li> </ul> <p>The reports will be analysed and recommendations will be proposed in view of print fleet optimisation (i.e. ensure that each machine is being properly used according to its specifications and that each department receives the appropriate devices according to its printing needs).</p> <p>To summarise, the reports will be used for the following purposes:</p> <ul style="list-style-type: none"> <li>- Optimisation of the print fleet allocation</li> <li>- Costs efficiency</li> <li>- Quality of service improvement</li> <li>- Efficiency and effectiveness of the print service</li> <li>- EMAS objectives achievement (providing each user with an individual consumption report to which only the user has access – based on authentication)</li> </ul>
2.2	Internal decision or initiative for this processing operation	<p>These ePrinters are installed to meet the objectives:</p> <ul style="list-style-type: none"> <li>- of the Parliamentary Project [ITEC P12] "Efficient printing" presented in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2017-2019.</li> <li>- of the Parliamentary Project "Needs-based printing in the digital age" in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2019-2021.</li> <li>- of the EMAS objectives (reduction of paper, toner and electricity consumption for IT equipment).</li> </ul>
2.3	(If applicable) Purpose(s) for further processing and safeguards in place	<b>N/A (Support/Debugging, Statistics and reporting are included in the scope of the processing itself)</b>

Nr.	Item	Description
2.4	Lawfulness (to be checked with the <b>Data Protection Coordinator</b> )	<input checked="" type="checkbox"/> Article 5 (1.a) - Task carried out in the public interest or in the exercise of official authority vested in the Union institution or body ( <i>Remark: It shall be laid down in Union Law</i> ), or for the functioning of the EUIs, as per the interpretation of the EDPS <sup>1</sup> <input type="checkbox"/> Article 5 (1.b) - Legal obligation to which the Data Controller is subject ( <i>Remark: It shall be laid down in Union Law</i> ) <input type="checkbox"/> Article 5 (1.c) - Performance of contract (specific choice of data subjects) <input type="checkbox"/> Article 5 (1.d) - Data subjects' consent - freely given, specific, informed and unambiguous (clear affirmative action from data subject) <input type="checkbox"/> Article 5 (1.e) - Protect the vital interest of data subjects or other individuals
2.5	(if applicable) Data protection clause(s) (presenting the scope of the processor's mandate on processing personal data on behalf of the data controller)	N/A
<b>3. CATEGORIES OF DATA</b> Personal data means any information on an identified or identifiable natural person. Tick the relevant boxes to indicate the categories of data processed.		
3.1	List of personal data processed <sup>2</sup> per category	<p><b><u>Civil status data and identification</u></b></p> <input checked="" type="checkbox"/> First name and last name <input type="checkbox"/> Gender <input type="checkbox"/> Citizenship(s) <input type="checkbox"/> Identification card number <input type="checkbox"/> Photography <input type="checkbox"/> Date of birth <input type="checkbox"/> Place of birth <input type="checkbox"/> Other, please specify: Click to enter text <hr/> <p><b><u>Data related to the professional sphere</u></b></p> <input type="checkbox"/> Office number <input type="checkbox"/> Phone number <input checked="" type="checkbox"/> Email address <input checked="" type="checkbox"/> Organisational entity (Directorate, Unit, Service) <input type="checkbox"/> Employee number <input type="checkbox"/> Job title (especially if it is unique) <input type="checkbox"/> Data about recruitment <input type="checkbox"/> Training <input type="checkbox"/> Skills <input type="checkbox"/> Degree and certification <input type="checkbox"/> Employee's work <input type="checkbox"/> Communication <input type="checkbox"/> Employment contract and salary <input type="checkbox"/> Leave and absence <input type="checkbox"/> Missions <input type="checkbox"/> Career <input type="checkbox"/> Ability and efficiency <input type="checkbox"/> Conduct <input type="checkbox"/> Other, please specify: Click to enter text

<sup>1</sup> According to the EDPS guidelines ([Accountability on the ground, v. 1.2 - December 2018](#)): "not all processing operations required for the functioning of the EUIs are explicitly mandated by legislation; recital [22] explains that they are nonetheless covered here, e.g. internal staff directory, access control".

<sup>2</sup> 'processing of personal data': any operation performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Nr.	Item	Description
		<p>-----</p> <p><b>Data related to the private sphere</b></p> <p><input type="checkbox"/> Home address                      <input type="checkbox"/> Phone number                      <input type="checkbox"/> Email address</p> <p><input type="checkbox"/> Bank account                      <input type="checkbox"/> Credit card number                      <input type="checkbox"/> Habits of life</p> <p><input type="checkbox"/> Family situation                      <input type="checkbox"/> Social security and pensions                      <input type="checkbox"/> Income</p> <p><input type="checkbox"/> Financial situation                      <input type="checkbox"/> Fiscal situation</p> <p><input type="checkbox"/> Other, please specify: Click to enter text</p> <p>-----</p> <p><b>Technical data</b></p> <p><input checked="" type="checkbox"/> Username                      <input type="checkbox"/> Identifier                      <input type="checkbox"/> Location data</p> <p><input type="checkbox"/> Internet Protocol (IP) address                      <input type="checkbox"/> MAC address                      <input type="checkbox"/> Cookie ID</p> <p><input checked="" type="checkbox"/> Other, please specify: Badge number, Windows user ID, password, username, technical job name (print, copy, scan job), date of the job and personal data included in the printing, copying and scanning data</p> <p>-----</p> <p><input checked="" type="checkbox"/> <b>Other category(ies) of specific data (list the personal data)</b></p> <p><i>(E.g. Data on physical characters)</i> Please specify: For the global statistics (per machine assigned per entity) and individual statistics (per users available for consultation purposes only to the concerned user) on consumption: Records generated during the printing processing operations: the number and type of printed pages, the colorimetric mode (color; black and white) and the printing date. The content of the printing processing operations is/will not be recorded.</p>
3.2	Special categories of personal data	<p><input type="checkbox"/> Revealing racial or ethnic origin</p> <p><input type="checkbox"/> Revealing political opinions</p> <p><input type="checkbox"/> Revealing religious or philosophical beliefs</p> <p><input type="checkbox"/> Revealing trade union membership</p> <p><input type="checkbox"/> Processing of genetic data</p> <p><input type="checkbox"/> Processing of biometric data for the purpose of uniquely identifying a natural person</p> <p><input type="checkbox"/> Processing of data concerning health</p> <p><input type="checkbox"/> Processing of data concerning a natural person's sex life or sexual orientation</p>

Nr.	Item	Description
<b>4. DATA PROCESSING</b> <i>Data processing means any operation carried out on personal data, whether or not by automated means.</i>		
4.1	Collection of data	<input checked="" type="checkbox"/> <b>[Directly]</b> Collection from the data subject - please specify: During the authentication process, the user gives his/her credentials and badge number (first authentication) then only his/her badge number (next authentications). The badge number is given by just scanning the badge on the dedicated zone of the device. Then the data subject has the possibility to insert, modify and delete a file or a configuration. <input checked="" type="checkbox"/> <b>[Indirectly]</b> Other source of collection - please specify: Personal data retrieved from the Active directory (Windows directory services, i.e. Windows user ID, first name, last name, email). All information is imported via several LDAP connectors to the Active directory.
4.2	Mode of processing	<input type="checkbox"/> <b>[Fully automated]</b> Processing fully automated, without any human intervention <input type="checkbox"/> <b>[Highly automated]</b> Processing automated, with human intervention only for maintenance and support <input checked="" type="checkbox"/> <b>[Mainly automated]</b> Processing automated, with human intervention only for supervision and monitoring as well as maintenance and support <input type="checkbox"/> <b>[Partly automated]</b> Processing in part automated, managed/conducted by human intervention <input type="checkbox"/> <b>[No automated]</b> Manual processing of a structured set of data accessible according to given criteria
4.3	Time limit for keeping the personal data (with the starting date and its justification)	<p><b>Per category of personal data or functionality</b>  <b>On the current archives:</b></p> <ul style="list-style-type: none"> <li>- <b>For the authentication process</b>, login personal data (i.e. Windows user ID, first name, last name, email) are synchronized (i.e. continuously collected and so updated) with the Windows directory services (corporate directory).</li> <li>- <b>For the printing</b>, personal data (related to the content of the documents printed or to be printed) are kept up to 96 hours since the creation of the printing jobs (when the files are sent to print). During this period, the data subjects have the following possibilities:             <ul style="list-style-type: none"> <li>• To delete the files to print (in this case personal data are automatically deleted).</li> <li>• To print the files (in this case personal data are moved in the "Printed Jobs" tab with possibility to reprint the files, which are deleted at the end of the 96 hours).</li> <li>• To print and delete the files via the feature "Print + Delete" available in the "Options" window (in this case personal data are automatically deleted).</li> </ul> </li> <li>- <b>For the copying</b>, personal data (related to the content of the documents) are kept on the multifunctional devices (MFDs) during the time of the copying process.</li> <li>- <b>For the scanning</b>, personal data (related to the content of the documents) are kept on the multifunctional devices (MFDs) during the time of the scanning process. Personal data are then transferred to the scan destinations chosen by the data subjects. The retention period for these transferred personal data are the ones established for each system of destination.</li> </ul>

Nr.	Item	Description
		<p><b>On the intermediate archives:</b></p> <p>- <b>For the activity logs used to produce global and individual statistics on printing processing operations,</b> records in databases are generated during the printing operations. These records include personal data on paper and ink consumption (not on the content of the documents that are deleted in any case after 96 hours) that are: the number and type of printed pages, the colorimetric mode (color; black and white) and the printing date.</p> <p>These data are only about the consumption itself. They are used for the global statistics (per machine assigned per entity) and they will be used for individual statistics (per users available for consultation purposes only to the concerned user) on consumption.</p> <p>The individual statistics on consumption are in development. The users (data subjects) will be informed prior to the activation of this new feature to start the individual statistics. The individual statistics will be presented to the users (provision of a user dashboard and/or user notifications) to raise awareness (self-awareness) on their own impact on the environment.</p> <p>These records will be retained for a maximum of 18 months from the moment they are collected to raise awareness based on statistics covering a sufficient period to present at least two situations of the same context and be able to compare these situations. For instance, it is not useful to compare May 2019 and May 2020, but it is useful to compare semester per semester or summer period per summer period. To do so, it is necessary to have more than 1 year since the context (e.g. session weeks or financial procedures) may not occur on the same dates, but some weeks later.</p> <p>- <b>For the activity logs used for support/debugging purposes,</b> there are different levels of logging available. In normal conditions, neither user information nor job information is recorded. However, at maximum level of logging (to debug an issue), the user identifier, the user name, the technical job identifier and the technical job name can be recorded depending on the nature of the issue. All type of logs are kept for 30 days, except in case of an error where data are deleted after the issue is resolved or after 1 year if it comes first.</p> <p><b>In case of an investigation (duly justified),</b> the same retention period rules will apply. Personal data will be transferred directly to the competent authority managing its own processing operation and its own retention period rules.</p>
4.4	Date or period of the beginning of the processing	Autumn 2018 (individual statistics foreseen in the beginning of 2020)
4.5	Date or period of the ending of the processing	Not foreseen
4.6	File location	<input type="checkbox"/> Standalone device: Please specify <input checked="" type="checkbox"/> Parliament network: <a href="#">Data centers of the European Parliament</a> <input type="checkbox"/> Interinstitutional network: Please specify (indicate the institution(s) involved) <input type="checkbox"/> Internet: Please specify (e.g. give the URL address) <input type="checkbox"/> Other: Please specify



Nr.	Item	Description
<b>5. RECIPIENTS &amp; DATA TRANSFER</b>		
5.1	Recipients or categories of recipients to whom data are or will be disclosed <b>Recipients:</b> <i>Physical or legal persons, administration, companies, staff under the controller or another service within EP, etc.</i>	Personal data are stored exclusively with restricted access on internal European Parliament servers. These personal data are accessible to the application owner (ITEC - PRINTING Unit). A limited number of back-office staff members (ITEC - OPERATIONS Unit) may receive (if necessary, i.e. for support/debugging purposes) log files.
/	<i>If the Data Controller (in practice) envisages transferring (or has already transferred*) personal data, please answer the questions in this section. * The Regulation (EU) 2018/1725 came into force on the 11th of December 2018. This record presents the characteristics of processing operations processed since the coming into force of this Regulation (since the 11/12/2018). The previous period is not considered here.</i>	
5.2	Are there transfers foreseen (or already made)?	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
-- 5.2.1	If yes, what types of transfers are they (or will that be)?	<input checked="" type="checkbox"/> Within the European Parliament: <a href="#">[Deliberate transfer if necessary, i.e. for support/debugging purposes]</a> log files referring only to job IDs (not to the data subjects) are sent to a limited number of back-office staff members (ITEC - OPERATIONS Unit) for support/debugging purposes.  <input type="checkbox"/> Within or between EU institutions, bodies, offices and agencies: <a href="#">Click to enter text</a>  <input type="checkbox"/> To recipients other than the EU institutions and bodies (e.g. national administrations, private sector), please specify: <a href="#">Click to enter text</a>  <input type="checkbox"/> To recipients outside the EU (e.g. third countries or international organisations) - please specify the adequate level(s) of protection <sup>3</sup> , the nature of the data that [may be/were] transmitted and their recipient: <a href="#">Click to enter text</a>  <input type="checkbox"/> Other, please specify: <a href="#">Click to enter text</a>
-- 5.2.2	If yes, [will/have] the data [be/been] transferred following a request from the recipient?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No (request from the application owner requesting to solve a problem/an incident : support/debugging purposes)
-- 5.2.3	If yes, [will/have] the data [be/been] transferred following a request from the data subject?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No (request from the application owner requesting to solve a problem/an incident : support/debugging purposes)

<sup>3</sup> The 'adequate level(s) of protection' may be:

- An adequacy decision by the EC
- An international agreement
- Appropriate safeguards (e.g. standard data protection clauses adopted by the EC or the EDPS; contractual clauses or provisions authorised by EDPS)
- Derogations for specific situations (e.g. protect vital interests; important reasons of public interest; establishment, exercise or defence of legal claims)

Nr.	Item	Description
-- 5.2.4	If yes, [will/Has] the recipient [be/been] informed of his obligations in respect of this transfer?	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
-- 5.2.5	If yes, will the transfer be carried out by a contractor <sup>4</sup> (or is it carried out by a contractor)?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No
<b>6. SECURITY</b>		
<i>The Data Controller (in practice) must implement the appropriate technical and organisational measures to ensure an appropriate security level with a view to the prevention of any unauthorised distribution or access, any accidental or illicit destruction, any accidental loss or deterioration, as well as any other form of illicit processing. Give a general description allowing a preliminary evaluation of the adequacy of the measures taken to ensure the security of processing</i>		
6.1	Physical security <i>(Access to computer systems, quality of the file supports, public access or restricted access to locations, storage, transport of equipment, etc.)</i>	<p>The new devices require user a physical authentication</p> <p>When data subject (user) send files to print (job for printing) from a device (PC or mobile device), he/she can only collect his/her files after authentication.</p> <p>Authentication process:</p> <ul style="list-style-type: none"> <li>- First authentication: the user gives his/her credentials and badge number (by scanning it).</li> <li>- Next authentications: the user gives only his/her badge number (by scanning it).</li> </ul> <p>Further detail on the authentication process (in case the badge is lost/stolen):</p> <p>If there is a the loss or the theft of a badge, the data subject can inform the HelpDesk that will notify directly DG SAFE, which will deactivated or blocked the badge without delay. The MFDs system are not be able to accept a deactivated or blocked badge (no delay). Once DG SAFE is notified, DG SAFE launches immediately the process to create a new one. His/her badge will be linked directly to his/her new account. He/she will need to restart the authentication process (first authentication).</p> <p>Servers storing personal data have a strictly limited physical access.</p> <p>HDD Erase function: The HDD Data Erase will automatically overwrite and erase image data immediately after the job is completed; therefore, no trace of the data remains on the hard disk. It will perform an overwrite up to 3 times (DoD 5220.22M 3 pass) with random data for maximum security protection.</p>
6.2	IT system(s) security <i>(Coding control, undue removal or transmission of data, passwords, encrypted directories, backup, audit trails for data processing and communication, etc.)</i>	<p>The HDD Data Encryption uses AES256-bit length encryption keys. This ensures that the data stored on the hard disk is protected against leakage of confidential information by theft of the hard disk.</p> <p>Data are encrypted for the printing, scanning and copying. The end-to-end encryption will depend on all terminals used:</p> <ul style="list-style-type: none"> <li>• The MFDs are all encrypted.</li> <li>• The EP servers used in the solution are all encrypted. Print server Spool file encryption protect files spooled to await on servers.</li> </ul>

<sup>4</sup> Contractor: considered as a processor when processing personal data on behalf of the data controller

Nr.	Item	Description								
		<ul style="list-style-type: none"> <li>• The terminal of the user (i.e. if the PC, mobile phone, tablet [sending the document to be printed or receiving the document scanning]).               <ul style="list-style-type: none"> <li>○ The corporate terminals are all encrypted (desktop, laptop, hybrid)</li> <li>○ The personal devices cannot be connected to UniFlow</li> </ul> </li> </ul> <p>Further details on the print jobs (stored up to 96 hours): The Canon solution (uniFLOW) also uses AES 256-bit encryption to protect print job data while in transmission over the network. To protect print jobs from being output at an unwanted device, the encrypted secured print feature holds the job in a queue until the user release the job using one of the agreed authentication method. For the authentication to the Parliament's devices, users need to use badge to unlock the MF Device to access any function.</p>								
6.3	Staff security (Restricted access codes, conditions of subcontracting, etc.)	Concerning the accounting data in database: accounting and reporting information is only available for the "Admin" ACL (Access Control List) group.								
<b>7. DATA SUBJECTS</b> <i>The persons to be protected are identified or identifiable natural persons whose personal data are processed by the European Parliament in any context whatsoever.</i>										
7.1	Category (or categories) of data subjects and its (their) description(s)	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;"><u>Category(ies) of data subjects defined regarding the status of individuals working for/within the EU institutions (EUIs):</u></th> <th style="width: 50%;"><u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>5</sup>:</u></th> </tr> </thead> <tbody> <tr> <td style="vertical-align: top;"> <input checked="" type="checkbox"/> EP Officials / <input checked="" type="checkbox"/> Other EUIs Officials  <input checked="" type="checkbox"/> EP Temporary agents / <input checked="" type="checkbox"/> Other EUIs Temporary agents  <input checked="" type="checkbox"/> EP Contract agents / <input checked="" type="checkbox"/> Other EUIs Contract agents  <input checked="" type="checkbox"/> EP Trainees / <input checked="" type="checkbox"/> Other EUIs Trainees  <input type="checkbox"/> EP External agents / <input type="checkbox"/> Other EUIs External agents  <input checked="" type="checkbox"/> MEPs  <input checked="" type="checkbox"/> APAs (Accredited Parliamentary Assistant)  <input checked="" type="checkbox"/> Others, please specify: <i>cf. Description in the right column.</i> </td> <td style="vertical-align: top;"> <p>Please specify: <a href="#">Persons entitled to consume the European Parliament printing / scanning / copying services.</a></p> </td> </tr> <tr> <th style="border-top: 1px dashed black;"><u>Category(ies) of data subjects defined regarding the external relationship with the EU institutions (EUIs):</u></th> <th style="border-top: 1px dashed black;"><u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>6</sup>:</u></th> </tr> <tr> <td style="vertical-align: top;"> <input type="checkbox"/> European citizens  <input type="checkbox"/> Visitor of the European Parliament / <input type="checkbox"/> Visitor of other EUIs  <input checked="" type="checkbox"/> Others, please specify: <a href="#">Former MEPs, retired Officials</a> </td> <td style="vertical-align: top;"> <p>Please specify: <a href="#">Persons entitled to consume the European Parliament printing / scanning / copying services.</a></p> </td> </tr> </tbody> </table>	<u>Category(ies) of data subjects defined regarding the status of individuals working for/within the EU institutions (EUIs):</u>	<u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>5</sup>:</u>	<input checked="" type="checkbox"/> EP Officials / <input checked="" type="checkbox"/> Other EUIs Officials <input checked="" type="checkbox"/> EP Temporary agents / <input checked="" type="checkbox"/> Other EUIs Temporary agents <input checked="" type="checkbox"/> EP Contract agents / <input checked="" type="checkbox"/> Other EUIs Contract agents <input checked="" type="checkbox"/> EP Trainees / <input checked="" type="checkbox"/> Other EUIs Trainees <input type="checkbox"/> EP External agents / <input type="checkbox"/> Other EUIs External agents <input checked="" type="checkbox"/> MEPs <input checked="" type="checkbox"/> APAs (Accredited Parliamentary Assistant) <input checked="" type="checkbox"/> Others, please specify: <i>cf. Description in the right column.</i>	<p>Please specify: <a href="#">Persons entitled to consume the European Parliament printing / scanning / copying services.</a></p>	<u>Category(ies) of data subjects defined regarding the external relationship with the EU institutions (EUIs):</u>	<u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>6</sup>:</u>	<input type="checkbox"/> European citizens <input type="checkbox"/> Visitor of the European Parliament / <input type="checkbox"/> Visitor of other EUIs <input checked="" type="checkbox"/> Others, please specify: <a href="#">Former MEPs, retired Officials</a>	<p>Please specify: <a href="#">Persons entitled to consume the European Parliament printing / scanning / copying services.</a></p>
<u>Category(ies) of data subjects defined regarding the status of individuals working for/within the EU institutions (EUIs):</u>	<u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>5</sup>:</u>									
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<sup>5</sup> For instance: [Persons](#) equipped with a physical token / [Persons](#) having access to the EP Intranet.

<sup>6</sup> *Ibid*

Nr.	Item	Description	
7.2	Measures taken or envisaged to inform the data subject of the identity of the Data Controller (in practice), of the personal data processing on his/her data, and of his/her rights as a data subject.	<p>There are two communication tools to inform the data subject:</p> <ul style="list-style-type: none"> <li>- Data Protection Notice notifying the data subjects of the processing of personal data and inviting them to see the Data Protection Statement for further information on the processing.</li> <li>- Data Protection Statement informing data subjects of all mandatory elements mentioned in Article 15 and 16 of Regulation (EU) 2018/1725.</li> </ul> <p>Additional features have been requested (to the solutions' provider - Canon) in order to be able to inform correctly the data subjects (information up-to-date).</p>	
7.3	How data subjects may exercise their rights (such as rights of access, to rectification, to erasure, of blocking and to object)?	<p>By sending an email to <a href="mailto:efficient_printing@ep.europa.eu">efficient_printing@ep.europa.eu</a>. Their requests will be analysed and processed.</p> <p>Additional features have been requested (to the solutions' provider - Canon) in order to be able to reply to data subjects' requests.</p>	
7.4	Have any natural or legal persons employed by or under contract to the European Parliament received any instructions about confidentiality in processing personal data?	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No	
7.5	Is there any decision taken automatically (without any human intervention) that can have a negative impact on a specific individual?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No	
<b>8. FURTHER INFORMATION</b>			
<i>Give any information you consider relevant and indicate the heading it refers to:</i>			
<p><b>Points 3.1 and 3.2:</b></p> <p>Different natures of personal data (present in the documents to be printed, copied and/or scanned) may be processed in the MFDs in order to print/scan/copy the documents themselves. However, the MFDs do not analyse the content of the documents, do not store the content of the documents scanned/copied and do not store longer than 96 hours the content of the documents printed or to be printed (time where the data subject can launch or relaunch the print job(s) of his/her documents).</p>			
<b>9. ACCOUNTABILITY</b>			
<i>Document references or links with Data Protection aspects proving the choices and measures taken</i>			
<i>=&gt; NECESSARY AND ESSENTIAL TO BE ABLE TO DEMONSTRATE COMPLIANCE</i>			
/	/	Type of document	Reference, links and/or location
9.1	Information document	<input checked="" type="checkbox"/> Data Protection Statement ( <i>providing the individual with the detailed description of the processing, of his/her rights and how to exercise them</i> )	<p>Data Protection Statement:</p> <ul style="list-style-type: none"> <li>- on the intranet: <a href="https://epintranet.in.ep.europa.eu/home/browse-as/it-support/it-security-data-protection/it-protection-personal-data.html">https://epintranet.in.ep.europa.eu/home/browse-as/it-support/it-security-data-protection/it-protection-personal-data.html</a></li> <li>- on the user manual</li> <li>- close to the machine</li> </ul>

Nr.	Item	Description	
		<input checked="" type="checkbox"/> Data Protection Notice(s) ( <i>notifying the individual whether or not personal data are processed</i> )	Data Protection Notice published: - on the poster - in the emails of communication - in the emails sending the scan job [current analysis of feasibility]
		<input type="checkbox"/> Protocol ( <i>sharing instructions about confidentiality in processing personal data</i> )	
		<input type="checkbox"/> Others, please specify: <a href="#">Click to enter text</a>	
9.2	Project and technical documents	<input type="checkbox"/> Project documents (e.g. annex on Data Protection within the Business Case)	
		<input type="checkbox"/> Technical specifications documents	
		<input type="checkbox"/> User manual documents	
		<input checked="" type="checkbox"/> Others, please specify: <a href="#">Canon documents where the EP requested further features/analysis on data protection</a>	- EP GDPR information handling - Security Strategy For Prod. environment at EP - Uniflow – scripts for support of GDPR_EP - Data flow diagrams
9.3	Security documents	<input type="checkbox"/> DPIA documents (where applicable)	
		<input type="checkbox"/> Technical security measures' documents	
		<input type="checkbox"/> Organisational security measures' documents	
		<input checked="" type="checkbox"/> Others, please specify: <a href="#">High risk pre-assessment</a>	High-risk pre-assessment performed by the EP.
9.4	Others, please specify:		

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The "Data Controller in practice" declares the accuracy of the above statements and undertakes to update any change affecting this information.

Date:

Signature of the "Data Controller in practice":

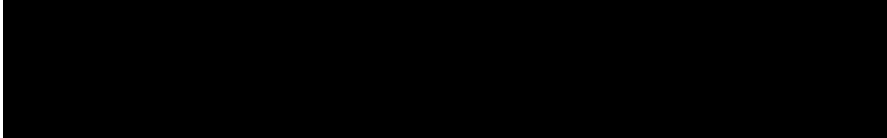
## Data Protection - DG ITEC Record of processing activity

### Description of personal data processing

**Purpose:** This file presents a detailed description of a personal data processing. **Such description has to be included in the Record file** in the context of the Accountability principle laid down in Article 4(2) of Regulation (EU) 2018/1725. Please refer to Article 31 of Regulation (EU) 2018/1725 presenting the requirements on Records of processing activities.

**By signing this document, the “Data Controller in practice” of the processing declares the accuracy of the statements and undertakes to update any change affecting this information.**

Nr	Item	Description
<b>1. GENERAL INFORMATION</b>		
<b>1.1</b>	Record reference	DG-ITEC/C/1
<b>1.2</b>	Record creation date	10/01/2019
<b>1.3</b>	Record last updated	11/10/2019
<b>1.4</b>	Record language	<input checked="" type="checkbox"/> English / <input type="checkbox"/> French
<b>1.5</b>	Name of the personal data processing <i>(ideally referring to a business process)</i>	<b>Multifunctional devices (MFDs) for printing, copying and scanning with authentication process</b>
<b>1.6</b>	Frame of reference of the personal data processing	<input type="checkbox"/> Business process basis <i>(Set of related structured activities/tasks producing a specific service/product)</i> <input type="checkbox"/> Programme basis <i>(Set of related projects managed in a coordinated manner)</i> <input type="checkbox"/> Project basis <input checked="" type="checkbox"/> Application basis
<b>1.7</b>	Short description of the context of the processing	<p>The multifunctional devices (MFDs) are installed to meet the objectives of the Parliamentary Project [ITEC P12] "Efficient printing" presented in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2017-2019, of the Parliamentary Project "Needs-based printing in the digital age" in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2019-2021 as well as the EMAS objectives (reduction of paper, toner and electricity consumption for IT equipment).</p> <p>The MFDs provides support for the employees/MEPs to execute basic and necessary tasks in the context of their work relationship/mandate.</p>
<b>1.8</b>	Name and contact details of the Data Controller  <b><i>Data Controller:</i></b> <i>Union institution or body or the directorate-general or any other organisational entity which determines the purposes and means of the processing of personal data.</i> <b>=&gt; MAKE DECISIONS ON THE PROCESSING</b> <b>=&gt; ACCOUNTABLE [Answerable for actions, decisions and performance]</b>	<p><b>European Parliament</b>  <b>Brussels (Belgium)</b>            Postal address: Rue Wiertz 60, B-1047 - Brussels, Belgium            Telephone: +32 2 284 20 05            Email: <a href="mailto:epbrussels@europarl.europa.eu">epbrussels@europarl.europa.eu</a></p>

Nr	Item	Description
1.9	<p>Name and contact details of the Data "Controller in practice" (internal controller)</p> <p><b>Data "Controller in practice":</b>  <i>Responsible of the processing on behalf of the data controller, which determines the purposes and means of the processing of personal data. This person should be the Business, Project or the Application Owner. This role should be held at least at the Unit level or at the Directorate or Directorate-General level depending on the scope of the processing operation.</i>  =&gt; MAKE DECISIONS ON THE PROCESSING  =&gt; RESPONSIBLE [Obligation to act and take decisions to achieve required outcome]</p>	
1.10	Name and contact details of the Data Protection Officer	<p><b>European Parliament Data Protection Officer</b>  Postal address: KAD 06A001, 2 rue Alcide De Gasperi, L-2929 - Luxembourg, Luxembourg  Telephone: +32 2 284 20 05  Email: <a href="mailto:data-protection@europarl.europa.eu">data-protection@europarl.europa.eu</a></p>
1.11	<p>Name and contact details of joint controller (where applicable)</p> <p><b>Joint Controller(s):</b>  <i>Where two or more data controllers jointly determine the purposes and means of processing, they shall be joint controllers. They determine in a transparent manner their respective responsibilities for compliance with their data protection obligations by means of an arrangement between them (unless determined by Union or Member State law).</i>  =&gt; MAKE DECISIONS ON THE PROCESSING  =&gt; SHARED ACCOUNTABILITY [Answerable for actions, decisions and performance]</p>	N/A
1.12	<p>Name and contact details of processor (where applicable)</p> <p><b>Processor:</b>  <i>Natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.</i>  =&gt; FOLLOW DECISIONS AND INSTRUCTIONS OF THE DATA CONTROLLER IN WRITING</p>	<p>N/A  Machines are leased, so every intervention (Upgrade and maintenance of the solution) on the machines have to be made by the provider (Canon). External persons do not have access to personal data present in production (only to anonymised data).</p>
1.13	Functional mailbox for enquiries on processing of personal data (to be preferably used)	<a href="mailto:efficient_printing@ep.europa.eu">efficient_printing@ep.europa.eu</a>

Nr	Item	Description
<b>2. PURPOSE AND LEGAL BASIS OF PROCESSING</b>		
<i>Personal data must be processed only for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes.</i>		
<b>2.1</b>	<p>Purpose of this processing of personal data  <i>Why personal data are used?</i>  <i>What are the global features?</i>  <i>What are the opportunities or the outcome of their use?</i></p>	<p>The multifunctional devices (MFDs) use personal data to provide more efficiency (for the printing / scanning / copying usage). They give the possibility to send jobs for printing (files to print) from PCs or mobile devices. The MFDs use also personal data to provide more security (e.g. higher level of protection for the printed documents) as well as to raise awareness on the paper and ink consumptions, in order to reduce the environmental impacts.</p> <p><b>About the user interface:</b>  These devices require user authentication to avoid physical interception of documents:</p> <ul style="list-style-type: none"> <li>- For the first time: necessity to register the EP badge (ID and password from the EP LDAP required),</li> <li>- For the next times: necessity to scan the EP badge.</li> </ul> <p>After scanning their EP badge on the MFDs, the data subjects (users) have access to different parameters where they can choose to modify, print or delete files (previously sent to the printer) or to scan or copy files.</p> <p><b>About the necessary use of personal data:</b>  Content of documents of printing/scanning/copying jobs is processed only in order to print/scan/copy the documents themselves. The content of documents of scanning and copying jobs is not stored. The content of the documents of printing jobs (documents printed or to be printed) is stored no longer than 96 hours (which is the time where the data subject can launch or relaunch the print of his/her documents).</p> <p>Log-in data and activity logs (also personal data) are processed only to enable each user to be authenticated for the printing of their documents, for support/debugging purposes and for statistical purposes (i.e. global and individual statistics). The global statistics refer to the reports aggregated per machine assigned to an entity (e.g. Unit, Directorate). The individual statistics refer to the personal consumption reports made available for consultation purposes only to the concerned user (raise awareness individually on environmental impact).</p> <p><b>About security:</b>  The MFDs improve:</p> <ul style="list-style-type: none"> <li>- The protection for confidential documents (i.e. the printing of documents only happens after the user authenticates at the machine, to avoid exposing them on a machine).</li> <li>- The security of the IT systems, because the solution restricts unauthorised access to the MFDs. The print/scan/copy services are made available only to the authorised personnel based on authentication.</li> </ul> <p><b>About the global and individual statistics (only on the consumption, not on the content):</b></p> <ul style="list-style-type: none"> <li>- The MFDs aggregates printing consumption information and produce global statistics (aggregated per machine assigned to an entity) that will be used to determine the appropriate allocation of printing resources according to the business needs across the buildings. Therefore, such data will</li> </ul>



Nr	Item	Description
		<p>be used for reporting to enforce a corporate printing strategy, for instance to reduce the number of colour and simplex printed pages.</p> <ul style="list-style-type: none"> <li>- The MFDs will produce as well individual and personal printing statistics [NB: future feature] that will be made available for consultation to each individual user. This is an EMAS objective (the users must receive access to personal printing statistics in order to raise their awareness about the ecological impact of their printing activities). The goal is to encourage each user (data subject) to reduce his/her impact on the environment. Such data will be reported (for consultation purposes) only to the concerned user (data subject) via a specific web portal accessible upon authentication.</li> </ul> <p><b>About the reporting:</b></p> <p>The following aggregated reports will be automatically generated on demand and presented to the managers of Efficient Printing to evaluate the performance of the strategy:</p> <ul style="list-style-type: none"> <li>- Consumption reporting per entity (Service, Unit and Directorate)</li> <li>- Consumption: black&amp;white vs colour (per entity)</li> <li>- Consumption: simplex vs duplex (per entity)</li> <li>- Consumption reports per individual machine</li> <li>- Consumption reports per machine category (model)</li> <li>- Ecological reports</li> </ul> <p>The reports will be analysed and recommendations will be proposed in view of print fleet optimisation (i.e. ensure that each machine is being properly used according to its specifications and that each department receives the appropriate devices according to its printing needs).</p> <p>To summarise, the reports will be used for the following purposes:</p> <ul style="list-style-type: none"> <li>- Optimisation of the print fleet allocation</li> <li>- Costs efficiency</li> <li>- Quality of service improvement</li> <li>- Efficiency and effectiveness of the print service</li> <li>- EMAS objectives achievement (providing each user with an individual consumption report to which only the user has access – based on authentication)</li> </ul>
2.2	Internal decision or initiative for this processing operation	<p>These ePrinters are installed to meet the objectives:</p> <ul style="list-style-type: none"> <li>- of the Parliamentary Project [ITEC P12] "Efficient printing" presented in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2017-2019.</li> <li>- of the Parliamentary Project "Needs-based printing in the digital age" in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2019-2021.</li> <li>- of the EMAS objectives (reduction of paper, toner and electricity consumption for IT equipment).</li> </ul>
2.3	(If applicable) Purpose(s) for further processing and safeguards in place	N/A (Support/Debugging, Statistics and reporting are included in the scope of the processing itself)

Nr.	Item	Description
2.4	Lawfulness (to be checked with the <b>Data Protection Coordinator</b> )	<input checked="" type="checkbox"/> Article 5 (1.a) - Task carried out in the public interest or in the exercise of official authority vested in the Union institution or body ( <i>Remark: It shall be laid down in Union Law</i> ), or for the functioning of the EUIs, as per the interpretation of the EDPS <sup>1</sup> <input type="checkbox"/> Article 5 (1.b) - Legal obligation to which the Data Controller is subject ( <i>Remark: It shall be laid down in Union Law</i> ) <input type="checkbox"/> Article 5 (1.c) - Performance of contract (specific choice of data subjects) <input type="checkbox"/> Article 5 (1.d) - Data subjects' consent - freely given, specific, informed and unambiguous (clear affirmative action from data subject) <input type="checkbox"/> Article 5 (1.e) - Protect the vital interest of data subjects or other individuals
2.5	(if applicable) Data protection clause(s) (presenting the scope of the processor's mandate on processing personal data on behalf of the data controller)	N/A
<b>3. CATEGORIES OF DATA</b> Personal data means any information on an identified or identifiable natural person. Tick the relevant boxes to indicate the categories of data processed.		
3.1	List of personal data processed <sup>2</sup> per category	<p><b>Civil status data and identification</b></p> <input checked="" type="checkbox"/> First name and last name <input type="checkbox"/> Gender <input type="checkbox"/> Citizenship(s) <input type="checkbox"/> Identification card number <input type="checkbox"/> Photography <input type="checkbox"/> Date of birth <input type="checkbox"/> Place of birth <input type="checkbox"/> Other, please specify: Click to enter text <hr/> <p><b>Data related to the professional sphere</b></p> <input type="checkbox"/> Office number <input type="checkbox"/> Phone number <input checked="" type="checkbox"/> Email address <input checked="" type="checkbox"/> Organisational entity (Directorate, Unit, Service) <input type="checkbox"/> Employee number <input type="checkbox"/> Job title (especially if it is unique) <input type="checkbox"/> Data about recruitment <input type="checkbox"/> Training <input type="checkbox"/> Skills <input type="checkbox"/> Degree and certification <input type="checkbox"/> Employee's work <input type="checkbox"/> Communication <input type="checkbox"/> Employment contract and salary <input type="checkbox"/> Leave and absence <input type="checkbox"/> Missions <input type="checkbox"/> Career <input type="checkbox"/> Ability and efficiency <input type="checkbox"/> Conduct <input type="checkbox"/> Other, please specify: Click to enter text

<sup>1</sup> According to the EDPS guidelines (Accountability on the ground, v. 1.2 - December 2018): "not all processing operations required for the functioning of the EUIs are explicitly mandated by legislation; recital [22] explains that they are nonetheless covered here, e.g. internal staff directory, access control".

<sup>2</sup> 'processing of personal data': any operation performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Nr	Item	Description
		<p>.....</p> <p><b>Data related to the private sphere</b></p> <p> <input type="checkbox"/> Home address                      <input type="checkbox"/> Phone number                      <input type="checkbox"/> Email address  <input type="checkbox"/> Bank account                      <input type="checkbox"/> Credit card number                      <input type="checkbox"/> Habits of life  <input type="checkbox"/> Family situation                      <input type="checkbox"/> Social security and pensions                      <input type="checkbox"/> Income  <input type="checkbox"/> Financial situation                      <input type="checkbox"/> Fiscal situation  <input type="checkbox"/> Other, please specify:                      Click to enter text                 </p> <p>.....</p> <p><b>Technical data</b></p> <p> <input checked="" type="checkbox"/> Username                      <input type="checkbox"/> Identifier                      <input type="checkbox"/> Location data  <input type="checkbox"/> Internet Protocol (IP) address                      <input type="checkbox"/> MAC address                      <input type="checkbox"/> Cookie ID  <input checked="" type="checkbox"/> Other, please specify:                      Badge number, Windows user ID, password, username, technical job name (print, copy, scan job), date of the job and personal data included in the printing, copying and scanning data                 </p> <p>.....</p> <p><input checked="" type="checkbox"/> <b>Other category(ies) of specific data (list the personal data)</b></p> <p><i>(E.g. Data on physical characters)</i>                      Please specify:                      For the global statistics (per machine assigned per entity) and individual statistics (per users available for consultation purposes only to the concerned user) on consumption: Records generated during the printing processing operations: the number and type of printed pages, the colorimetric mode (color; black and white) and the printing date. The content of the printing processing operations is/will not be recorded.</p>
<p><b>3.2</b></p>	<p>Special categories of personal data</p>	<p> <input type="checkbox"/> Revealing racial or ethnic origin  <input type="checkbox"/> Revealing political opinions  <input type="checkbox"/> Revealing religious or philosophical beliefs  <input type="checkbox"/> Revealing trade union membership  <input type="checkbox"/> Processing of genetic data  <input type="checkbox"/> Processing of biometric data for the purpose of uniquely identifying a natural person  <input type="checkbox"/> Processing of data concerning health  <input type="checkbox"/> Processing of data concerning a natural person's sex life or sexual orientation                 </p>

Nr	Item	Description
<b>4. DATA PROCESSING</b> <i>Data processing means any operation carried out on personal data, whether or not by automated means.</i>		
4.1	Collection of data	<input checked="" type="checkbox"/> <b>[Directly]</b> Collection from the data subject - please specify: During the authentication process, the user gives his/her credentials and badge number (first authentication) then only his/her badge number (next authentications). The badge number is given by just scanning the badge on the dedicated zone of the device. Then the data subject has the possibility to insert, modify and delete a file or a configuration. <input checked="" type="checkbox"/> <b>[Indirectly]</b> Other source of collection - please specify: Personal data retrieved from the Active directory (Windows directory services, i.e. Windows user ID, first name, last name, email). All information is imported via several LDAP connectors to the Active directory.
4.2	Mode of processing	<input type="checkbox"/> <b>[Fully automated]</b> Processing fully automated, without any human intervention <input type="checkbox"/> <b>[Highly automated]</b> Processing automated, with human intervention only for maintenance and support <input checked="" type="checkbox"/> <b>[Mainly automated]</b> Processing automated, with human intervention only for supervision and monitoring as well as maintenance and support <input type="checkbox"/> <b>[Partly automated]</b> Processing in part automated, managed/conducted by human intervention <input type="checkbox"/> <b>[No automated]</b> Manual processing of a structured set of data accessible according to given criteria
4.3	Time limit for keeping the personal data (with the starting date and its justification)	<p><b>Per category of personal data or functionality</b>  <b>On the current archives:</b></p> <p>- <b>For the authentication process</b>, login personal data (i.e. Windows user ID, first name, last name, email) are synchronized (i.e. continuously collected and so updated) with the Windows directory services (corporate directory).</p> <p>- <b>For the printing</b>, personal data (related to the content of the documents printed or to be printed) are kept up to 96 hours since the creation of the printing jobs (when the files are sent to print). During this period, the data subjects have the following possibilities:</p> <ul style="list-style-type: none"> <li>• To delete the files to print (in this case personal data are automatically deleted).</li> <li>• To print the files (in this case personal data are moved in the "Printed Jobs" tab with possibility to reprint the files, which are deleted at the end of the 96 hours).</li> <li>• To print and delete the files via the feature "Print + Delete" available in the "Options" window (in this case personal data are automatically deleted).</li> </ul> <p>- <b>For the copying</b>, personal data (related to the content of the documents) are kept on the multifunctional devices (MFDs) during the time of the copying process.</p> <p>- <b>For the scanning</b>, personal data (related to the content of the documents) are kept on the multifunctional devices (MFDs) during the time of the scanning process. Personal data are then transferred to the scan destinations chosen by the data subjects. The retention period for these transferred personal data are the ones established for each system of destination.</p>

Nr	Item	Description
		<p><b>On the intermediate archives:</b></p> <p>- <b>For the activity logs used to produce global and individual statistics on printing processing operations,</b> records in databases are generated during the printing operations. These records include personal data on paper and ink consumption (not on the content of the documents that are deleted in any case after 96 hours) that are: the number and type of printed pages, the colorimetric mode (color; black and white) and the printing date.</p> <p>These data are only about the consumption itself. They are used for the global statistics (per machine assigned per entity) and they will be used for individual statistics (per users available for consultation purposes only to the concerned user) on consumption.</p> <p>The individual statistics on consumption are in development. The users (data subjects) will be informed prior to the activation of this new feature to start the individual statistics. The individual statistics will be presented to the users (provision of a user dashboard and/or user notifications) to raise awareness (self-awareness) on their own impact on the environment.</p> <p>These records will be retained for a maximum of 18 months from the moment they are collected to raise awareness based on statistics covering a sufficient period to present at least two situations of the same context and be able to compare these situations. For instance, it is not useful to compare May 2019 and May 2020, but it is useful to compare semester per semester or summer period per summer period. To do so, it is necessary to have more than 1 year since the context (e.g. session weeks or financial procedures) may not occur on the same dates, but some weeks later.</p> <p>- <b>For the activity logs used for support/debugging purposes,</b> there are different levels of logging available. In normal conditions, neither user information nor job information is recorded. However, at maximum level of logging (to debug an issue), the user identifier, the user name, the technical job identifier and the technical job name can be recorded depending on the nature of the issue. All type of logs are kept for 30 days, except in case of an error where data are deleted after the issue is resolved or after 1 year if it comes first.</p> <p><b>In case of an investigation (duly justified),</b> the same retention period rules will apply. Personal data will be transferred directly to the competent authority managing its own processing operation and its own retention period rules.</p>
4.4	Date or period of the beginning of the processing	Autumn 2018 (individual statistics foreseen in the beginning of 2020)
4.5	Date or period of the ending of the processing	Not foreseen
4.6	File location	<input type="checkbox"/> Standalone device: Please specify <input checked="" type="checkbox"/> Parliament network: Data centers of the European Parliament <input type="checkbox"/> Interinstitutional network: Please specify (indicate the institution(s) involved) <input type="checkbox"/> Internet: Please specify (e.g. give the URL address) <input type="checkbox"/> Other: Please specify

Nr.	Item	Description
<b>5. RECIPIENTS &amp; DATA TRANSFER</b>		
5.1	Recipients or categories of recipients to whom data are or will be disclosed <b>Recipients:</b> <i>Physical or legal persons, administration, companies, staff under the controller or another service within EP, etc.</i>	Personal data are stored exclusively with restricted access on internal European Parliament servers. These personal data are accessible to the application owner (ITEC - PRINTING Unit). A limited number of back-office staff members (ITEC - OPERATIONS Unit) may receive (if necessary, i.e. for support/debugging purposes) log files.
/	<i>If the Data Controller (in practice) envisages transferring (or has already transferred*) personal data, please answer the questions in this section.            * The Regulation (EU) 2018/1725 came into force on the 11th of December 2018. This record presents the characteristics of processing operations processed since the coming into force of this Regulation (since the 11/12/2018). The previous period is not considered here.</i>	
5.2	Are there transfers foreseen (or already made)?	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
-- 5.2.1	If yes, what types of transfers are they (or will that be)?	<input checked="" type="checkbox"/> Within the European Parliament: [Deliberate transfer if necessary, i.e. for support/debugging purposes] log files referring only to job IDs (not to the data subjects) are sent to a limited number of back-office staff members (ITEC - OPERATIONS Unit) for support/debugging purposes.  <input type="checkbox"/> Within or between EU institutions, bodies, offices and agencies: Click to enter text  <input type="checkbox"/> To recipients other than the EU institutions and bodies (e.g. national administrations, private sector), please specify: Click to enter text  <input type="checkbox"/> To recipients outside the EU (e.g. third countries or international organisations) - please specify the adequate level(s) of protection <sup>3</sup> , the nature of the data that [may be/were] transmitted and their recipient: Click to enter text  <input type="checkbox"/> Other, please specify: Click to enter text
-- 5.2.2	If yes, [will/have] the data [be/been] transferred following a request from the recipient?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No (request from the application owner requesting to solve a problem/an incident : support/debugging purposes)
-- 5.2.3	If yes, [will/have] the data [be/been] transferred following a request from the data subject?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No (request from the application owner requesting to solve a problem/an incident : support/debugging purposes)

<sup>3</sup> The 'adequate level(s) of protection' may be:

- An adequacy decision by the EC
- An international agreement
- Appropriate safeguards (e.g. standard data protection clauses adopted by the EC or the EDPS; contractual clauses or provisions authorised by EDPS)
- Derogations for specific situations (e.g. protect vital interests; important reasons of public interest; establishment, exercise or defence of legal claims)

Nr	Item	Description
-- 5.2.4	If yes, [will/Has] the recipient [be/been] informed of his obligations in respect of this transfer?	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
-- 5.2.5	If yes, will the transfer be carried out by a contractor <sup>4</sup> (or is it carried out by a contractor)?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No
<b>6. SECURITY</b>		
<i>The Data Controller (in practice) must implement the appropriate technical and organisational measures to ensure an appropriate security level with a view to the prevention of any unauthorised distribution or access, any accidental or illicit destruction, any accidental loss or deterioration, as well as any other form of illicit processing. Give a general description allowing a preliminary evaluation of the adequacy of the measures taken to ensure the security of processing</i>		
6.1	Physical security (Access to computer systems, quality of the file supports, public access or restricted access to locations, storage, transport of equipment, etc.)	<p>The new devices require user a physical authentication</p> <p>When data subject (user) send files to print (job for printing) from a device (PC or mobile device), he/she can only collect his/her files after authentication.</p> <p>Authentication process:</p> <ul style="list-style-type: none"> <li>- First authentication: the user gives his/her credentials and badge number (by scanning it).</li> <li>- Next authentications: the user gives only his/her badge number (by scanning it).</li> </ul> <p>Further detail on the authentication process (in case the badge is lost/stolen): If there is a the loss or the theft of a badge, the data subject can inform the HelpDesk that will notify directly DG SAFE, which will deactivated or blocked the badge without delay. The MFDs system are not be able to accept a deactivated or blocked badge (no delay). Once DG SAFE is notified, DG SAFE launches immediately the process to create a new one. His/her badge will be linked directly to his/her new account. He/she will need to restart the authentication process (first authentication).</p> <p>Servers storing personal data have a strictly limited physical access.</p> <p>HDD Erase function: The HDD Data Erase will automatically overwrite and erase image data immediately after the job is completed; therefore, no trace of the data remains on the hard disk. It will perform an overwrite up to 3 times (DoD 5220.22M 3 pass) with random data for maximum security protection.</p>
6.2	IT system(s) security (Coding control, undue removal or transmission of data, passwords, encrypted directories, backup, audit trails for data processing and communication, etc.)	<p>The HDD Data Encryption uses AES256-bit length encryption keys. This ensures that the data stored on the hard disk is protected against leakage of confidential information by theft of the hard disk.</p> <p>Data are encrypted for the printing, scanning and copying. The end-to-end encryption will depend on all terminals used:</p> <ul style="list-style-type: none"> <li>• The MFDs are all encrypted.</li> <li>• The EP servers used in the solution are all encrypted. Print server Spool file encryption protect files spooled to await on servers.</li> </ul>

<sup>4</sup> Contractor: considered as a processor when processing personal data on behalf of the data controller

Nr.	Item	Description		
		<ul style="list-style-type: none"> <li>• The terminal of the user (i.e. if the PC, mobile phone, tablet [sending the document to be printed or receiving the document scanning]).                             <ul style="list-style-type: none"> <li>○ The corporate terminals are all encrypted (desktop, laptop, hybrid)</li> <li>○ The personal devices cannot be connected to UniFlow</li> </ul> </li> </ul> <p>Further details on the print jobs (stored up to 96 hours):                      The Canon solution (uniFLOW) also uses AES 256-bit encryption to protect print job data while in transmission over the network. To protect print jobs from being output at an unwanted device, the encrypted secured print feature holds the job in a queue until the user release the job using one of the agreed authentication method. For the authentication to the Parliament's devices, users need to use badge to unlock the MF Device to access any function.</p>		
6.3	Staff security <i>(Restricted access codes, conditions of subcontracting, etc.)</i>	Concerning the accounting data in database: accounting and reporting information is only available for the "Admin" ACL (Access Control List) group.		
<b>7. DATA SUBJECTS</b> <i>The persons to be protected are identified or identifiable natural persons whose personal data are processed by the European Parliament in any context whatsoever.</i>				
7.1	Category (or categories) of data subjects and its (their) description(s)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> <p><b><u>Category(ies) of data subjects defined regarding the status of individuals working for/within the EU institutions (EUIs):</u></b></p> <p> <input checked="" type="checkbox"/> EP Officials / <input checked="" type="checkbox"/> Other EUIs Officials  <input checked="" type="checkbox"/> EP Temporary agents / <input checked="" type="checkbox"/> Other EUIs Temporary agents  <input checked="" type="checkbox"/> EP Contract agents / <input checked="" type="checkbox"/> Other EUIs Contract agents  <input checked="" type="checkbox"/> EP Trainees / <input checked="" type="checkbox"/> Other EUIs Trainees  <input type="checkbox"/> EP External agents / <input type="checkbox"/> Other EUIs External agents  <input checked="" type="checkbox"/> MEPs  <input checked="" type="checkbox"/> APAs (Accredited Parliamentary Assistant)  <input checked="" type="checkbox"/> Others, please specify: cf. Description in the right column.                             </p> <p><b><u>Category(ies) of data subjects defined regarding the external relationship with the EU institutions (EUIs):</u></b></p> <p> <input type="checkbox"/> European citizens  <input type="checkbox"/> Visitor of the European Parliament / <input type="checkbox"/> Visitor of other EUIs  <input checked="" type="checkbox"/> Others, please specify: Former MEPs, retired Officials                             </p> </td> <td style="width: 50%; vertical-align: top;"> <p><b><u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>5</sup>:</u></b></p> <p>Please specify: Persons entitled to consume the European Parliament printing / scanning / copying services.</p> <hr/> <p><b><u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>6</sup>:</u></b></p> <p>Please specify: Persons entitled to consume the European Parliament printing / scanning / copying services.</p> </td> </tr> </table>	<p><b><u>Category(ies) of data subjects defined regarding the status of individuals working for/within the EU institutions (EUIs):</u></b></p> <p> <input checked="" type="checkbox"/> EP Officials / <input checked="" type="checkbox"/> Other EUIs Officials  <input checked="" type="checkbox"/> EP Temporary agents / <input checked="" type="checkbox"/> Other EUIs Temporary agents  <input checked="" type="checkbox"/> EP Contract agents / <input checked="" type="checkbox"/> Other EUIs Contract agents  <input checked="" type="checkbox"/> EP Trainees / <input checked="" type="checkbox"/> Other EUIs Trainees  <input type="checkbox"/> EP External agents / <input type="checkbox"/> Other EUIs External agents  <input checked="" type="checkbox"/> MEPs  <input checked="" type="checkbox"/> APAs (Accredited Parliamentary Assistant)  <input checked="" type="checkbox"/> Others, please specify: cf. Description in the right column.                             </p> <p><b><u>Category(ies) of data subjects defined regarding the external relationship with the EU institutions (EUIs):</u></b></p> <p> <input type="checkbox"/> European citizens  <input type="checkbox"/> Visitor of the European Parliament / <input type="checkbox"/> Visitor of other EUIs  <input checked="" type="checkbox"/> Others, please specify: Former MEPs, retired Officials                             </p>	<p><b><u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>5</sup>:</u></b></p> <p>Please specify: Persons entitled to consume the European Parliament printing / scanning / copying services.</p> <hr/> <p><b><u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>6</sup>:</u></b></p> <p>Please specify: Persons entitled to consume the European Parliament printing / scanning / copying services.</p>
<p><b><u>Category(ies) of data subjects defined regarding the status of individuals working for/within the EU institutions (EUIs):</u></b></p> <p> <input checked="" type="checkbox"/> EP Officials / <input checked="" type="checkbox"/> Other EUIs Officials  <input checked="" type="checkbox"/> EP Temporary agents / <input checked="" type="checkbox"/> Other EUIs Temporary agents  <input checked="" type="checkbox"/> EP Contract agents / <input checked="" type="checkbox"/> Other EUIs Contract agents  <input checked="" type="checkbox"/> EP Trainees / <input checked="" type="checkbox"/> Other EUIs Trainees  <input type="checkbox"/> EP External agents / <input type="checkbox"/> Other EUIs External agents  <input checked="" type="checkbox"/> MEPs  <input checked="" type="checkbox"/> APAs (Accredited Parliamentary Assistant)  <input checked="" type="checkbox"/> Others, please specify: cf. Description in the right column.                             </p> <p><b><u>Category(ies) of data subjects defined regarding the external relationship with the EU institutions (EUIs):</u></b></p> <p> <input type="checkbox"/> European citizens  <input type="checkbox"/> Visitor of the European Parliament / <input type="checkbox"/> Visitor of other EUIs  <input checked="" type="checkbox"/> Others, please specify: Former MEPs, retired Officials                             </p>	<p><b><u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>5</sup>:</u></b></p> <p>Please specify: Persons entitled to consume the European Parliament printing / scanning / copying services.</p> <hr/> <p><b><u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>6</sup>:</u></b></p> <p>Please specify: Persons entitled to consume the European Parliament printing / scanning / copying services.</p>			

<sup>5</sup> For instance: Persons equipped with a physical token / Persons having access to the EP Intranet.

<sup>6</sup> *ibid*



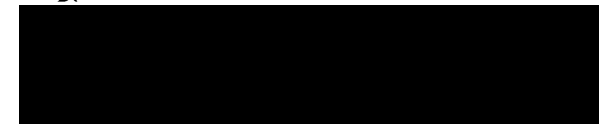
Nr.	Item	Description
7.2	Measures taken or envisaged to inform the data subject of the identity of the Data Controller (in practice), of the personal data processing on his/her data, and of his/her rights as a data subject.	<p>There are two communication tools to inform the data subject:</p> <ul style="list-style-type: none"> <li>- Data Protection Notice notifying the data subjects of the processing of personal data and inviting them to see the Data Protection Statement for further information on the processing.</li> <li>- Data Protection Statement informing data subjects of all mandatory elements mentioned in Article 15 and 16 of Regulation (EU) 2018/1725.</li> </ul> <p>Additional features have been requested (to the solutions' provider - Canon) in order to be able to inform correctly the data subjects (information up-to-date).</p>
7.3	How data subjects may exercise their rights (such as rights of access, to rectification, to erasure, of blocking and to object)?	<p>By sending an email to <a href="mailto:efficient_printing@ep.europa.eu">efficient_printing@ep.europa.eu</a>. Their requests will be analysed and processed.</p> <p>Additional features have been requested (to the solutions' provider - Canon) in order to be able to reply to data subjects' requests.</p>
7.4	Have any natural or legal persons employed by or under contract to the European Parliament received any instructions about confidentiality in processing personal data?	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
7.5	Is there any decision taken automatically (without any human intervention) that can have a negative impact on a specific individual?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No
<b>8. FURTHER INFORMATION</b>		
<i>Give any information you consider relevant and indicate the heading it refers to:</i>		
<p><b>Points 3.1 and 3.2:</b></p> <p>Different natures of personal data (present in the documents to be printed, copied and/or scanned) may be processed in the MFDs in order to print/scan/copy the documents themselves. However, the MFDs do not analyse the content of the documents, do not store the content of the documents scanned/copied and do not store longer than 96 hours the content of the documents printed or to be printed (time where the data subject can launch or relaunch the print job(s) of his/her documents).</p>		
<b>9. ACCOUNTABILITY</b>		
<i>Document references or links with Data Protection aspects proving the choices and measures taken</i>		
<b>=&gt; NECESSARY AND ESSENTIAL TO BE ABLE TO DEMONSTRATE COMPLIANCE</b>		
/	/	Type of document
9.1	Information document	<p><input checked="" type="checkbox"/> Data Protection Statement (<i>providing the individual with the detailed description of the processing, of his/her rights and how to exercise them</i>)</p>
		Reference, links and/or location
		<p>Data Protection Statement:</p> <ul style="list-style-type: none"> <li>- on the intranet: <a href="https://epintranet.in.ep.europa.eu/home/browse-as/it-support/it-security-data-protection/it-protection-personal-data.html">https://epintranet.in.ep.europa.eu/home/browse-as/it-support/it-security-data-protection/it-protection-personal-data.html</a></li> <li>- on the user manual</li> <li>- close to the machine</li> </ul>

Nr	Item	Description	
		<input checked="" type="checkbox"/> Data Protection Notice(s) ( <i>notifying the individual whether or not personal data are processed</i> )	Data Protection Notice published: - on the poster - in the emails of communication - in the emails sending the scan job [current analysis of feasibility]
		<input type="checkbox"/> Protocol ( <i>sharing instructions about confidentiality in processing personal data</i> )	
		<input type="checkbox"/> Others, please specify: Click to enter text	
9.2	Project and technical documents	<input type="checkbox"/> Project documents (e.g. annex on Data Protection within the Business Case)	
		<input type="checkbox"/> Technical specifications documents	
		<input type="checkbox"/> User manual documents	
		<input checked="" type="checkbox"/> Others, please specify: Canon documents where the EP requested further features/analysis on data protection	- EP GDPR information handling - Security Strategy For Prod. environment at EP - Uniflow – scripts for support of GDPR_EP - Data flow diagrams
9.3	Security documents	<input type="checkbox"/> DPIA documents (where applicable)	
		<input type="checkbox"/> Technical security measures' documents	
		<input type="checkbox"/> Organisational security measures' documents	
		<input checked="" type="checkbox"/> Others, please specify: High risk pre-assessment	High-risk pre-assessment performed by the EP.
9.4	Others, please specify:		

The "Data Controller in practice" declares the accuracy of the above statements and undertakes to update any change affecting this information.

Date: 23 / 10 / 2019

Signature of the "Data Controller in practice":



Directorate General: Innovation and Technological Support (DG ITEC)

## High-risk pre-assessment

### [on MFDs - Multifunctional devices]

**Purpose:** This document presents the high-risk pre-assessment (or “threshold assessment”) performed as a prior analysis to decide if it is necessary to carry out a DPIA (Data Protection Impact Assessment) under Article 39 of the EU-DPR (Regulation [EU] 2018/1725).

**Name of the processing operation:** Multifunctional devices for printing, copying and scanning with authentication process

**Entity of the data controller in practice:** DG ITEC/EDIT/Printing Unit

**Date of the high-risk pre-assessment:** 01/10/2019



Template last update: 01/2018- Version: 1.0

01/10/2019	DPIA - High-risk pre-assessment (prior analysis to decide on the necessity to carry out a DPIA)	Number of pages	7
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## 1. DETERMINATION OF APPLICABILITY OF AN EXCLUSION OR DEROGATION FROM CONDUCTING A DPIA

Description of derogation	Yes / No
<p><b>DPIA already carried out as a part of general impact assessment</b>                      Does the processing have a legal basis in a legal act adopted on the basis of the Treaties, which regulates the specific processing operation or set of operations in question, and where a DPIA has already been carried out as part of a general impact assessment preceding the adoption of that legal act and is done pursuant to point (a) or (b) of Article 5(1)?</p>	NO
<p><b>DPIA carried out for a similar processing operation</b>                      Was a DPIA carried out for a similar processing operation that presents similar high risks?</p>	NO
<p><b>EDPS list of processing operations prima facie not requiring DPIA</b>                      Does the processing activity correspond to any of the processing activities on this list?</p>	NO
<p>- Management of personal files under Article 26 of the Staff Regulation as such*  <i>*some procedures resulting in adding information to the personal file may require DPIAs, but not the repository of personal data as such.</i></p>	NO
- Standard staff evaluation procedures under the Staff Regulation (annual appraisal)	NO
- Standard 360° evaluations for helping staff members developing training plans	NO
- Standard staff selection procedures	NO
- Establishment of rights upon entry into service	NO
- Management of leave, flexitime and teleworking	NO
<p>- Standard access control systems (non-biometric*)  <i>*e.g. badges to be swiped at entry points.</i></p>	NO
- Standard CCTV on a limited scale (no facial recognition, coverage limited to entry/exit points, only on-premises, not in publicly accessible space)	NO

## 2. INDICATORS FOR HIGH RISKS

Do the processing operations present any of the characteristics mentioned below?	Yes [If so, describe] / No [if borderline: why not?]	Justification
<p><b>1. Systematic and extensive evaluation of personal aspects or scoring</b>, including profiling and predicting.</p> <p><i>Examples:</i></p> <ul style="list-style-type: none"> <li>- a bank screening transactions in accordance with applicable law to detect possibly fraudulent transactions;</li> <li>- profiling staff based on their transactions in a case management system with automatic reassignment of tasks.</li> </ul> <p><i>Counterexamples:</i> standard appraisal interviews, voluntary 360° evaluations for helping staff to develop training plans.</p>	NO	For the individual statistics [coming features], the multifunctional devices (MFDs) only store metadata on consumption (not the content of the documents) that will be made available for consultation to each individual user. These statistics will not refer to the performance of the user. The goal is to encourage each user (data subject) to reduce his/her impact on the environment. Such data will be reported (for consultation purposes) only to the concerned user (data subject) via a specific web portal accessible upon authentication.
<p><b>2. Automated-decision making with legal or similar significant effect</b>: processing that aims at taking decisions on data subjects.</p> <p><i>Example:</i> automated staff appraisal ('if you're in the lowest 10% of the team for the number of cases dealt with, you'll receive a "unsatisfactory" in your appraisal, no discussion').</p> <p><i>Counterexample:</i> a news site showing articles in an order based on past visits of the user.</p>	NO	/
<p><b>3. Systematic monitoring</b>: processing used to observe, monitor or control data subjects, especially in publicly accessible spaces. This may cover video-surveillance but also other monitoring, e.g. of internet use.</p> <p><i>Examples:</i> covert CCTV, smart CCTV in publicly accessible spaces, data loss prevention tools breaking SSL encryption, tracking movements via location data.</p> <p><i>Counterexample:</i> open CCTV of garage entry not covering public space.</p>	NO	/
<p><b>4. Sensitive data or data of a highly personal nature</b>: data revealing ethnic or racial origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data for uniquely identification purposes, data concerning health or sex life or sexual orientation, criminal convictions or offences and related security measures or data of highly personal nature.</p> <p><i>Examples:</i> pre-recruitment medical exams and criminal records checks, administrative investigations &amp; disciplinary proceedings, any use of 1:n biometric identification.</p> <p><i>Counterexample:</i> photos are not sensitive as such (only when coupled with facial recognition / biometrics or used to infer other sensitive data).</p>	NO	Different natures of personal data (present in the documents to be printed, copied and/or scanned) may be processed in the MFDs in order to print/scan/copy the documents themselves. However, the MFDs do not analyse the content of the documents, do not store the content of the documents scanned/copied and do not store longer than 96 hours the content of the documents printed or to be printed (time where the data subject can launch or relaunch the print job(s) of his/her documents).

<p><b>5. Data processed on a large scale</b>, whether based on number of people concerned and/or amount of data processed about each of them and/or permanence and/or geographical coverage.</p> <p><i>Examples: European databases on disease surveillance</i>  <i>Counterexample: invalidity procedures under Article 78 of the Staff Regulations in a medium-sized EUI.</i></p> <p>=&gt; The following factors should be considered:</p> <ol style="list-style-type: none"> <li>the number of data subjects concerned;</li> <li>the volume of data being processed;</li> <li>the duration/permanence, of the data processing activity;</li> <li>the geographical extent of the processing activity.</li> </ol>	<p>YES</p>	<p>Number of data subjects: ++++ (they are persons entitled to consume the European Parliament printing / scanning / copying services, such as the MEPs and APAs, the EP/Other EUIs officials, the EP/Other EUIs temporary and contract agents, the EP/Other EUIs trainees)</p> <p>Volume of data: ++++ (a lot of documents are processed in order to print/scan/copy the documents themselves)</p> <p>Period of retention: ++ (content of the documents are not stored longer than 96 hours, metadata on consumption are kept until 18 months)</p> <p>Geo. extent: + (the processing is performed in the EU territory mainly in Brussels, Strasbourg, Luxembourg and also in certain agencies)</p>
<p><b>6. Datasets matched or combined</b> from different data processing operations performed for different purposes and/or by different data controllers in a way that would exceed the reasonable expectations of the data subject.</p> <p><i>Example: cross-checking access control data and self-declared working hours following a suspicion of fraudulent declarations in an administrative inquiry (following the applicable rules).</i>  <i>Counterexample: further use of data processed for a grant application when auditing the grant process.</i></p>	<p>NO</p>	<p>Personal data are stored exclusively with restricted access on internal European Parliament servers. These personal data are accessible to the application owner (ITEC - PRINTING Unit). A limited number of back-office staff members (ITEC - OPERATIONS Unit) may receive (if necessary, i.e. for support/debugging purposes) log files. The user (data subject) will have access to his/her statistics.</p>
<p><b>7. Data concerning vulnerable data subjects:</b> situations where an imbalance in the relationship between the position of the data subject and the controller can be identified.</p> <p><i>Examples: children, asylum seekers, mentally ill persons</i>  <i>Counterexample: delegates in a Council Working Party (for attendance lists), members of expert groups (for travel cost reimbursement)</i></p>	<p>NO</p>	<p>The MFDs provides support for the employees/MEPs to execute basic and necessary tasks in the context of their work relationship/mandate.</p>
<p><b>8. Innovative use or applying technological or organisational solutions</b> that can involve novel forms of data collection and usage. Indeed, the personal and social consequences of the deployment of a new technology may be unknown.</p> <p><i>Examples: machine learning, connected cars, combining use of finger print and face recognition for improved physical access control, social media screening of job applicants..</i>  <i>Counterexample: 1:1 biometric access control using fingerprints</i></p> <p>=&gt; The use of a new technology, defined in “accordance with the achieved state of technological knowledge” can trigger the need to carry out a DPIA.</p>	<p>NO</p>	<p>/</p>

<p><b>9. Preventing data subjects from exercising a right or using a service or a contract.</b></p> <p><i>Examples: exclusion databases, credit screening</i>  <i>Counterexample: determination of rights upon entry into service (e.g. expatriation or dependent child allowances).</i></p>	<p>NO</p>	<p>For the individual statistics [coming features], the goal is to encourage each user (data subject) to reduce his/her impact on the environment. Such data will be reported (for consultation purposes) only to the concerned user (data subject) via a specific web portal accessible upon authentication. These statistics will not refer to the performance of the user. The user will not be blacklisted.</p>
<p><b>10. Data transfer to recipients outside the EU/EEA</b></p> <p><i>Examples: outsourcing to companies outside the EU/EEA; structured cooperation with an international organisation leading to the exchange of personal data.</i></p>	<p>NO</p>	<p>/</p>

### 3. DETERMINATION OF APPLICABILITY OF AN OBLIGATION TO CONDUCT A DPIA

Description of obligation	Yes / No
<b>EDPS list of processing operations prima facie requiring DPIA (EDPS decision of 16/07/2019)</b> Does the processing activity correspond to any of the processing activities in this list?	NO
- Exclusion data bases [cf. indicators 2, 4, 9]	NO
- Large-scale processing of special categories of personal data (such as disease surveillance, pharmacovigilance, central databases for law-enforcement cooperation) [cf. indicators 1, 4, 5, 8]	NO
- Internet traffic analysis breaking encryption (data loss prevention tools) [cf. indicators 1, 3, 8]	NO
- E-recruitment tools automatically pre-selecting/excluding candidates without human intervention [cf. indicators 1, 2, 8]	NO



#### 4. CONCLUSION

Number of "Yes" ticked above	1	Justification
A DPIA is not required as one or more from the derogations mentioned above apply (section II)	NO	/
A DPIA is required as one or more from the obligations mentioned above apply (section III)	NO	/
<p><b>Final assessment:</b>                      If you have two or more "YES" in the list of indicators above, you should carry out a DPIA.                      - If you consider that in the specific case at hand, risks are not "high" even though you have two or more "yes", explain and justify why you think the processing is in fact not "high risky".                      - If you consider that in the specific case at hand, risks are "high" even though you have less than two "yes", explain and justify why you think the processing is in fact "high risky".</p>	NO	<p>The MFDs process on a large-scale personal data, but it is normal due to the context and purpose of the processing. Indeed, the MFDs support for the employees/MEPs to execute basic and necessary tasks in the context of their work relationship/mandate.</p> <p>The MFDs do not analyse the content of documents, do not store documents scanned/copied and do not store longer than 96 hours the content of the documents printed or to be printed (time where the data subject can launch or relaunch the print job(s) of his/her documents).</p> <p>The MFDs record metadata on printing consumption (per machine assigned to an entity), and soon per user [coming features] to raise awareness on the environmental impact (EMAS objective). The individual statistics [coming features] will be made available for consultation to each individual user. These statistics will not refer to the performance of the user. The goal is to encourage each user (data subject) to reduce his/her impact on the environment. Such data will be reported (for consultation purposes) only to the concerned user (data subject) via a specific web portal accessible upon authentication.</p>

# Data Protection Statement - Multifunctional devices for printing, copying and scanning with authentication process

[Legal basis of the processing](#)

[Who is responsible for your data?](#)

[What are your rights regarding your personal data and how can you exercise them?](#)

[What are the personal data used?](#)

[Why are the personal data used and who can view them?](#)

[How long are the personal data kept?](#)

## **Legal basis of the processing**

The processing described below is carried out in accordance with [Regulation \(EU\) 2018/1725](#) (hereinafter ‘**the Regulation**’). The lawfulness of the processing is based on Article 5 (1.a) interpreted in the light of Preamble (Recital 22), since it is necessary for the performance of tasks carried out in the public interest by the European Parliament.

## **Who is responsible for your data?**

The data controller for this processing of personal data is the European Parliament and in particular XXXXXXXXXX (DG ITEC/EDIT/PRINTING).

## **What are your rights regarding your personal data and how can you exercise them?**

You, as a data subject, or your legal representative when applicable, may exercise the rights indicated hereafter by sending a request directly to [efficient\\_printing@ep.europa.eu](mailto:efficient_printing@ep.europa.eu).

You have the right of access your personal data and relevant information concerning how the data controller uses them [Article 17 of the Regulation]. You have the right to obtain the rectification of your inaccurate personal data and, taking into account the purposes of the processing, of your incomplete personal data [Article 18 of the Regulation]. Under certain conditions, you have the right to ask that the data controller deletes your personal data or restricts their use [Articles 19 and 20 of the Regulation]. You have the right to object to the processing of your personal data, on grounds relating to your particular situation, at any time [Article 23 of the Regulation].

The data controller will consider your request, take a decision and communicate it to you.

You have the right to have recourse at any time to the Data Protection Officer of the European Parliament (DPO) via the email address [data-protection@europarl.europa.eu](mailto:data-protection@europarl.europa.eu) and to the European Data Protection Supervisor (EDPS) via the email address [edps@edps.europa.eu](mailto:edps@edps.europa.eu).

## **What are the personal data used?**

The multifunctional devices (MFDs) use the following categories of personal data: first name, last name, email, Unit, Directorate, username, badge number, Windows user ID, password, username, technical job name (print, copy, scan job), date of the job and personal data included in the printing, copying and scanning data. The MFDs record the consumption generated during the printing processing operations: the number and type of printed pages, the colorimetric mode (color; black and white) and the printing date.

These personal data are collected directly from you when you are using the multifunctional devices (e.g. sending a file to print, launch the printing process on the printer) and indirectly from the Windows directory services (i.e. Windows user ID, first name, last name, email).

## **Why are the personal data used and who can view them?**

The multifunctional devices MFDs provides support for the employees/MEPs to execute basic and necessary tasks in the context of their work relationship/mandate.

The MFDs use personal data to provide more efficiency (on the printing / scanning / copying usage). It gives the possibility to send jobs for printing (files to print) from PCs or mobile devices. The MFDs use also personal data to provide more security (e.g. higher level of protection for the printed documents) as well as to raise awareness on the paper and ink consumptions in order to reduce the environmental impacts.

### **On the user interface:**

The MFDs require user authentication to avoid physical interceptions of documents:

- For the first time: you have to register your EP badge (ID and password from the EP LDAP required),
- For the next times: you have to scan your EP badge.

After scanning your EP badge on the MFDs, you have access to different parameters where you can choose to modify, print or delete files (previously sent to the printer) or to scan or copy files.

### **On the necessary use of personal data:**

Content of documents of printing/scanning/copying jobs is processed only in order to print/scan/copy the documents themselves. The content of documents of scanning and copying jobs is not stored. The content of the documents of printing jobs (documents printed or to be printed) is not stored longer than 96 hours (time where you can launch or relaunch the print job(s) of your documents).

Login data and activity logs (also personal data) are processed only to enable each user to be authenticated for the printing of their documents, for support/debugging purposes and for statistical purposes (i.e. global and individual statistics). The global statistics refer to the reports aggregated per machine assigned to an entity (e.g. Unit, Directorate). The individual statistics refer to the personal consumption reports made available for consultation purposes only to the concerned user (raise awareness individually on environmental impact).

**On the security:**

The MFDs improve:

- The protection for confidential documents (i.e. the printing of documents only after the user authenticates at the machine to avoid exposing them on a machine).
- The security of the IT systems because the solution restricts unauthorised access to the MFDs. The print/scan/copy services are made available only to the authorised personnel based on authentication.

**On the global and individual statistics (only on the consumption, not on the content):**

- The MFDs aggregates printing consumption information and produce global statistics (aggregated per machine assigned to an entity) that will be used to determine the appropriate allocation of printing resources according to the business needs across the buildings. Therefore, such data will be used for reporting to enforce a corporate printing strategy, for instance to reduce the number of colour and simplex printed pages.
- The MFDs will produce as well individual and personal printing statistics [coming features] that will be made available for consultation to each individual user. This is an EMAS objective (the users must receive access to personal printing statistics in order to raise their awareness about the ecological impact of their printing activities). The goal is to encourage you (as a user) to reduce your impact on the environment. Your personal data will be reported (for consultation purposes) only to you via a specific web portal accessible upon your authentication.

**On the reporting:**

The following aggregated reports will be automatically generated on demand and presented to the managers of Efficient Printing to evaluate the performance of the strategy:

- Consumption reporting per entity (Service, Unit and Directorate),
- Consumption: black&white vs colour (per entity),
- Consumption: simplex vs duplex (per entity),
- Consumption reports per individual machine,
- Consumption reports per machine category (model),
- Ecological reports.

The reports will be analysed and recommendations will be proposed in view of print fleet optimisation (i.e. ensure that each machine is being properly used according to its specifications and that each department receives the appropriate devices according to its printing needs).

As a conclusion, the reports will be used in the following purposes:

- Optimisation of the print fleet allocation
- Costs efficiency
- Quality of service improvement
- Efficiency and effectiveness of the print service
- EMAS objectives achievement (providing each user with an individual consumption report to which only the user has access – based on authentication)

**On the recipients (other than you):**

Personal data are stored exclusively with restricted access on internal European Parliament servers. These personal data are accessible to the application owner (ITEC - PRINTING Unit). A limited number of back-office staff members (ITEC - OPERATIONS Unit) may receive (if necessary, i.e. for support/debugging purposes) log files.

## How long are the personal data kept?

The personal data are stored in an encrypted form on European Parliament servers.

- **For the authentication process**, login personal data (i.e. Windows user ID, first name, last name, email) are synchronized (i.e. continuously collected and so updated) with the Windows directory services (corporate directory).

- **For the printing**, personal data (related to the content of the documents printed or to be printed) are kept up to 96 hours since the creation of the printing jobs (when the files are sent to print). During this period, you have the possibility on the multifunctional devices (MFDs):

- To delete the files to print (in this case personal data are automatically deleted).
- To print the files (in this case personal data are moved in the “Printed Jobs” tab with possibility to reprint the files and deleted at the end of the 96 hours).
- To print and delete the files via the feature “Print + Delete” available in the “Options” window (in this case personal data are automatically deleted).

- **For the copying**, personal data (related to the content of the documents) are kept on the multifunctional devices (MFDs) during the time of the copying process.

- **For the scanning**, personal data (related to the content of the documents) are kept on the multifunctional devices (MFDs) during the time of the scanning process. Personal data are then transferred to the scan destinations that you choose. The retention period for these transferred personal data are the ones established for each system of destination.

- **For the activity logs used to produce global and individual statistics on printing processing operations**, records in databases are generated during the printing operations. These records on printing consumption include personal data on paper and ink consumption (not content of the documents that are deleted in any case after 96 hours) that are: the number and type of printed pages, the colorimetric mode (color; black and white) and the printing date.

These data are only about the consumption itself. They are used for the global statistics (per machine assigned per entity) and they will be used for individual statistics (per users available for consultation purposes only to the concerned user) on consumption.

The individual statistics on consumption are in development. You will be informed prior to the activation of this new feature to start the individual statistics. Your individual statistics will be presented to you (provision of a user dashboard and/or user notifications) to raise awareness (self-awareness) on your own impact on the environment.

These records on printing consumption are retained for a maximum of 18 months from the moment they are created to raise awareness based on statistics covering a sufficient period to present at least two situations of the same context and be able to compare these situations.

- **For the activity logs used for support/debugging purposes**, there are different levels of logging available. In normal conditions, neither user information nor job information is recorded. However, at maximum level of logging (to debug an issue), the user identifier, the user name, the technical job identifier and the technical job name can be recorded depending on the nature of the issue. All type of logs are kept for 30 days, except in case of an error where data are deleted after the issue is resolved or after 1 year if it comes first.

**In case of an investigation (duly justified)**, the same retention period rules will apply. Personal data will be transferred directly to the competent authority managing its own processing operation and its own retention period rules.

# Data Protection Notices - Multifunctional devices for printing, copying and scanning with authentication process

## **On ITECnet (longer version)**

After scanning your badge, these multifunctional devices connect to internal servers to manage and execute your requests for printing, copying and scanning. These features use encrypted personal data - processed in accordance with Regulation (EU) 2018/1725 - to provide flexible usages and to avoid physical and electronic interceptions. The data used for printing, copying and scanning are stored exclusively on the internal European Parliament network.

For more information on the use of your personal data, please see the Data Protection Statement [\[LINK\]](#) or contact [efficient\\_printing@ep.europa.eu](mailto:efficient_printing@ep.europa.eu).

## **On Posters**

After scanning your badge, these devices connect to internal servers to manage your requests for printing, copying and scanning. These features use encrypted personal data - processed in accordance with Regulation (EU) 2018/1725 - to provide flexible usages and to avoid physical/electronic interceptions. For more details, please contact [efficient\\_printing@ep.europa.eu](mailto:efficient_printing@ep.europa.eu).

[REDACTED]

**From:** [REDACTED]  
**Sent:** 23 October 2019 14:58  
**To:** Data Protection EP  
**Cc:** ITEC\_LEGAL  
**Subject:** [Data Protection] Update of a declaration - "Multifunctional devices for printing, copying and scanning with authentication process" (internal ID #1057).

Dear [REDACTED],

We are updating the declaration named "Multifunctional devices for printing, copying and scanning with authentication process" (internal ID #1057).

We need to update the name of the data controller.

Could you please replace the name of the previous data controller [REDACTED] – DG ITEC/EDIT/Printing Unit) by the new one [REDACTED] – DG ITEC/EDIT/Printing Unit)?

We also prepared the relevant description of the processing (for the DG ITEC Record) to able to update their Data Protection Statement and comply with Regulation (EU) 2018/1725.

Many thanks in advance,



[REDACTED]

European Parliament  
Innovation and Technological Support  
Innovation and Resources  
Innovation, Performance and Internal Control

[REDACTED]

[REDACTED]

[www.europarl.europa.eu](http://www.europarl.europa.eu)

**From:** European Data Protection Supervisor  
**Sent:** 16 December 2019 16:16  
**To:** PETRUCCI Walter  
**Cc:** [REDACTED]  
**Subject:** Our ref.: 2019-0373 - D 2661  
**Attachments:** 19-12-16 Letter to Mr Petrucci - 2019-0373.pdf

Dear Sir,

Please find attached a letter signed by Mr WIEWIÓROWSKI for the above mentioned subject.

Please note that the signed letter will be sent to you by regular mail.

Kind regards,



**EDPS Secretariat**

| Tel. (+32) 228 31900 | Fax +32(0)22831950 | >

Email [edps@edps.europa.eu](mailto:edps@edps.europa.eu)

**European Data Protection Supervisor**

Postal address: Rue Wiertz 60, B-1047 Brussels

Office address: Rue Montoyer 30, B-1000 Brussels

 @EU\_EDPS  [www.edps.europa.eu](http://www.edps.europa.eu)

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WOJCIECH RAFAŁ WIEWIÓROWSKI  
SUPERVISOR

Mr Walter PETRUCCI  
Acting Director-General of the  
Directorate-General for Innovation and  
Technological Support of the EP  
BRU - RMD 07J014  
BELGIUM

16 DEC 2019

Brussels,

██████████ D(2019) 2661 C 2019-0373  
Please use [edps@edps.europa.eu](mailto:edps@edps.europa.eu) for all  
correspondence

**CONFIDENTIAL**

**Subject: EDPS order to provide information to data subjects | Consultation on the European Parliament 'efficient printing system' (EDPS case file 2019-0373)**

Dear Mr Petrucci,

We are writing to you in the context of the European Parliament consultation to the European Data Protection Supervisor (EDPS) on the 'efficient printing system'. This letter aims to address three points: 1) an order to bring the data processing into compliance and 2) preliminary remarks on individual statistics of the e-printer users.

The EDPS received the explanation and the documents provided on 24 October 2019 in case 2019-0373 regarding the multifunctional devices for printing, copying and scanning with authentication process of the European Parliament ('efficient printing system'), in response to our e-mail of 26 July 2019 requesting the EP to:

1. Change the **maximum retention period up to 96 hours**;
2. **Actively inform data subjects about the terms and conditions of the data processing**;
3. **Clarify the Controller-Processor relationship**;
4. Implement appropriate technical and organisational measures and safeguards on its servers;
5. **Perform a security risk assessment for the 'efficient printing' system**;
6. Implement those recommendations and provide the EDPS with the documentary evidence thereof within **three months**.

## 1) Order to bring the data processing regarding the efficient printing system into compliance

The EDPS takes note that the maximum retention period has changed and a security risk assessment for the 'efficient printing' system was performed, hence our recommendations 1 and 5 were implemented.

However, the EDPS notes that despite the three-month deadline given, some of the recommendations have not been implemented so far, in particular recommendation 2 to provide information to data subjects about the terms and conditions of the '**efficient printing system**' data processing. Please be reminded that this consultation begun on 16 April 2019, following a complaint submitted to the EDPS against the EP based on the lack of information provided to data subjects.

The EP has been exchanging information with the EDPS and explaining the reasons for the delay in implementing EDPS recommendation 2. Nevertheless, the EP has not yet duly informed the concerned data subjects.

In addition, please note that the implementation of the EDPS recommendation 2 does not need to involve complex arrangements. For example, an email with the information described in Article 15 and 16 of the Regulation (EU) 2018/1725 (the Regulation) would be enough to correct the situation regarding current data subjects' right to information. This could have been implemented by the EP, even while negotiations with the provider about a functionality to show a data protection notice on the printers' screen are still ongoing.

Consequently, the EP has been in breach of Article 15 and 16 of the Regulation since the personal data processing started at the end of 2018.

Therefore, in line with Article 58(2)(e) of the Regulation, **the EDPS hereby orders the EP to:**

1. **inform all data subjects whose data are processed by the 'efficient printing system' by 23 December 2019<sup>1</sup>;**
2. provide the EDPS the documentary evidence thereof by 23 December 2019.

The EDPS draws the attention of the EP to the fact that, under Article 58(5) of the Regulation, the exercise of the powers conferred on the EDPS pursuant to this Article shall be subject to appropriate safeguards, including effective judicial remedies and due process, set out in Union law.

Please be informed that the EDPS may consider exercising other of its powers, in accordance with Article 58 (2) of the Regulation, to ensure compliance with the relevant provisions and respect of the principles relating to the processing of personal data.

Please note that the controller-processor relationship is not completely clear either, since you mention that the 'solution provider' (Canon) '... does not have access and cannot use the personal data'. If it does not have access to personal data, it cannot use it. Nonetheless, if there are software updates with certain functions that are not in the control of the EP<sup>2</sup>, or if the 'solution provider' also has access to personal data – despite agreeing not to use the information – Canon is considered a processor.

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<sup>1</sup> The controller can choose the way in which the right to information is implemented. Posters and/or other disclaimers are very welcomed. Nonetheless, please be reminded that sending an email to all the users of the 'efficient printing system' seems to be the easiest, fastest and cheapest solution to ensure compliance.

<sup>2</sup> Please be reminded of the case with the Xerox printers.

Following this reasoning, the EDPS is not in a position to assess if the EP implemented the appropriate technical and organisational measures and safeguards on its servers.

## 2) Preliminary remarks on the users' individual statistics

In addition, in your email of 24 October you mention that individual statistics will be created and will be available for consultation to each user through web portal upon authentication. If the individual statistics evolve to a systematic scoring system (e.g. low printing record = environmentally conscientious user; high printing record = non-environmentally conscientious user), there might be a need to perform a DPIA. This information has been disclosed to the EDPS just now. We recommend you to reflect about the need and the purpose of this data processing.

Nonetheless, we are available to assist you in the risk assessment to the data subjects involved in this data processing.

Yours sincerely,



Wojciech Rafał WIEWIÓROWSKI

Cc:

[Redacted email addresses]

**From:** [REDACTED]  
**Sent:** 07 February 2020 13:50  
**To:** [REDACTED] Data Protection EP  
**Cc:** [REDACTED] European Data Protection Supervisor  
**Subject:** Case 2019-0373 - case closed

Dear [REDACTED]

We are writing to you regarding the EP consultation on the 'efficient printing system' (EDPS case 2019-0373).

Following the EP's implementation of the EDPS order of 16 December 2019 and the evidence thereof sent to the EDPS, as well as the adoption of our previous recommendation, we would like to inform you that the EDPS decided to close this case.

We know that the EP is in the process of developing internal individual statistics regarding the 'efficient printing system', which may raise some concerns in relation to data subjects' rights. We trust that the EP's relevant services will seek out your guidance on this topic.

We remain, as usual, available to provide any guidance that you find necessary and to assist you in the assessment of risks to the data subjects.

Yours sincerely,

[REDACTED]



[REDACTED]  
[REDACTED]  
**European Data Protection Supervisor**

Postal address: Rue Wiertz 60, B-1047 Brussels

Office address: Rue Montoyer 30, B-1000 Brussels

[@EU\\_EDPS](mailto:@EU_EDPS) [www.edps.europa.eu](http://www.edps.europa.eu)

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**From:** [REDACTED]  
**Sent:** 03 April 2020 14:22  
**To:** European Data Protection Supervisor  
**Cc:** [REDACTED]  
**Subject:** RE: Information request on Canon multifunctional devices (MFDs) & CoVID 19 measures - EDPS case file 2019-0373

Dear Mr Wiewiórowski,  
Not having received any comments from your side, can I take that as an assent to the action I described in my message below? Our users are waiting for the increase of the retention time and I would like to give the green light to the team in charge of the implementation.  
Thanks a lot for your feedback!  
Best regards,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 30 March 2020 17:06  
**To:** European Data Protection Supervisor  
**Cc:** [REDACTED]; [REDACTED]; Data Protection EP ; ITEC\_LEGAL ; [REDACTED]; [REDACTED]  
**Subject:** Information request on Canon multifunctional devices (MFDs) & CoVID 19 measures - EDPS case file 2019-0373

Dear Mr Wiewiórowski,  
I am contacting you concerning the Canon multifunctional devices (MFDs) in place at the European Parliament.  
As a consequence of the evolving situation regarding the COVID-19 outbreak and upon request by several users, we are planning to temporarily extend the retention period of documents sent for printing to the MFDs, in order to reduce the transmission risk of the virus.  
You may have received a communication sent last Friday afternoon on MFDs, which was inadvertently issued too early, while we were consulting our DPO ([REDACTED]) on the possibility to prior inform you on the retention period change and the related communication.  
Indeed, we appreciated your previous recommendations presented on these multifunctional devices and we would be glad to get your opinion on the following envisaged retention period change.  
The maximum retention period for printing documents (time where documents are available for printing) is still currently configured to 96 hours. We plan to increase this maximum period to 192 hours (so 8 days instead of 4 days) without making any other change in the system. This extension, applicable during the COVID-19 outbreak, would allow users who have a real need to be on premises to reduce their visits and therefore avoid non-necessary contacts with other MFDs users.  
To do so, we foresee to send as soon as possible a new communication informing correctly all users on this change (i.e. in English, French and German and by attaching the updated data protection statement).  
Please do not hesitate should you have any question or need further information.  
I look forward to hearing from you soon  
Yours sincerely,  
[REDACTED]  
Head of the Printing Unit and Data Controller for the MFDs

**From:** [REDACTED]  
**Sent:** 03 April 2020 16:11  
**To:** [REDACTED]  
**Cc:** European Data Protection Supervisor  
**Subject:** RE: Information request on Canon multifunctional devices (MFDs) & CoVID 19 measures - EDPS case file 2019-0373

Dear [REDACTED],

On behalf of the EDPS, I acknowledge receipt of your emails of 30 March and 3 April regarding the extension of the retention time of the Canon multifunctional devices by the European Parliament.

The EDPS considers that your request for extending the retention period to a maximum period up to 192 hours, in order to reduce the transmission risk of its users during the current pandemic crisis, is proportionate during the particular moments we are living, in light of the data protection principles. Therefore, provided that data subjects/users are duly informed about this change, we do not see any issues thereto related. However, we would like to highlight that the 96 hours retention period recommended by the EDPS in his consultation in this regard (EDPS case file 2019-0373) should be reestablished as soon as the exceptional measures to fight COVID-19 are no longer needed.

We remain at your disposal for any additional clarification you find necessary.

Yours sincerely,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 03 April 2020 14:22  
**To:** European Data Protection Supervisor  
**Cc:** [REDACTED]  
**Subject:** RE: Information request on Canon multifunctional devices (MFDs) & CoVID 19 measures - EDPS case file 2019-0373

Dear Mr Wiewiórowski,

Not having received any comments from your side, can I take that as an assent to the action I described in my message below? Our users are waiting for the increase of the retention time and I would like to give the green light to the team in charge of the implementation.

Thanks a lot for your feedback!

Best regards,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 30 March 2020 17:06  
**To:** European Data Protection Supervisor <[EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)>  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** Information request on Canon multifunctional devices (MFDs) & CoVID 19 measures - EDPS case file 2019-0373

Dear Mr Wiewiórowski,

I am contacting you concerning the Canon multifunctional devices (MFDs) in place at the European Parliament.

As a consequence of the evolving situation regarding the COVID-19 outbreak and upon request by several users, we are planning to temporarily extend the retention period of documents sent for printing to the MFDs, in order to reduce the transmission risk of the virus. You may have received a communication sent last Friday afternoon on MFDs, which was inadvertently issued too early, while we were consulting our DPO [REDACTED] on the possibility to prior inform you on the retention period change and the related communication.

Indeed, we appreciated your previous recommendations presented on these multifunctional devices and we would be glad to get your opinion on the following envisaged retention period change.

The maximum retention period for printing documents (time where documents are available for printing) is still currently configured to 96 hours. We plan to increase this maximum period to 192 hours (so 8 days instead of 4 days) without making any other change in the system. This extension, applicable during the COVID-19 outbreak, would allow users who have a real need to be on premises to reduce their visits and therefore avoid non-necessary contacts with other MFDs users.

To do so, we foresee to send as soon as possible a new communication informing correctly all users on this change (i.e. in English, French and German and by attaching the updated data protection statement).

Please do not hesitate should you have any question or need further information.

I look forward to hearing from you soon

Yours sincerely,



Head of the Printing Unit and Data Controller for the MFDs

**From:** [REDACTED]  
**Sent:** 03 April 2020 16:35  
**To:** [REDACTED]  
**Cc:** European Data Protection Supervisor  
**Subject:** RE: Information request on Canon multifunctional devices (MFDs) & CoVID 19 measures - EDPS case file 2019-0373

Dear [REDACTED],

Thank you for your message and the positive answer. We will duly inform the users and of course do the necessary to revert to the 96 hours retention period when the circumstances will allow it.

Yours sincerely,  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** 03 April 2020 16:11  
**To:** [REDACTED]  
**Cc:** European Data Protection Supervisor  
**Subject:** RE: Information request on Canon multifunctional devices (MFDs) & CoVID 19 measures - EDPS case file 2019-0373

Dear [REDACTED],

On behalf of the EDPS, I acknowledge receipt of your emails of 30 March and 3 April regarding the extension of the retention time of the Canon multifunctional devices by the European Parliament. The EDPS considers that your request for extending the retention period to a maximum period up to 192 hours, in order to reduce the transmission risk of its users during the current pandemic crisis, is proportionate during the particular moments we are living, in light of the data protection principles. Therefore, provided that data subjects/users are duly informed about this change, we do not see any issues thereto related.

However, we would like to highlight that the 96 hours retention period recommended by the EDPS in his consultation in this regard (EDPS case file 2019-0373) should be reestablished as soon as the exceptional measures to fight COVID-19 are no longer needed.

We remain at your disposal for any additional clarification you find necessary.

Yours sincerely,  
[REDACTED]

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**Sent:** 03 April 2020 14:22  
**To:** European Data Protection Supervisor <[EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)>  
**Cc:** [REDACTED]  
**Subject:** RE: Information request on Canon multifunctional devices (MFDs) & CoVID 19 measures - EDPS case file 2019-0373

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Best regards,  
[REDACTED]

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**To:** European Data Protection Supervisor <[EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)>  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



**Subject:** Information request on Canon multifunctional devices (MFDs) & CoVID 19 measures - EDPS case file 2019-0373

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To do so, we foresee to send as soon as possible a new communication informing correctly all users on this change (i.e. in English, French and German and by attaching the updated data protection statement).

Please do not hesitate should you have any question or need further information.

I look forward to hearing from you soon

Yours sincerely,

██████████

Head of the Printing Unit and Data Controller for the MFDs