

## **PROTECTION OF YOUR PERSONAL DATA**

**This privacy statement provides information about the processing and the protection of your personal data**

### **1. Introduction**

The European Union Agency for the Operational Management of Large-scale IT Systems in the Area of Freedom, Security and Justice (hereafter, 'eu-LISA') is committed to protect your personal data and to respect your privacy. eu-LISA collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data

The information in relation to processing operation 'Work & Resource Management' undertaken by eu-LISA's Enterprise Project Management Office (EPMO) is presented below.

### **2. Why and how do we process your personal data?**

eu-LISA collects and uses your personal data to ensure adequate information is logged in Planview ProjectPlace, reflecting Agency's work, business as usual activities (BAU) and informal projects, and manage its resources capacity, in order to drive efficient planning and execution of its activities.

Planview ProjectPlace is a collaborative work management platform, necessary for eu-LISA's business management purposes for the collaboration and exchange of information between resources (staff, intramuros and external users) on specific work related to the workspaces they are assigned to, where team members have a single place to get all work done. By using Planview Projectplace, team members can provide their input by working on comments or actions/tasks assigned to them, including review of documents.

Specific mandatory personal information (e.g.: full name, organization, email address) is initially loaded into Planview ProjectPlace as metadata to create your account in order to enable you and eu-LISA to perform the forth mentioned activities.

Your personal data may be obtained by EPMO directly from you or indirectly, from your organization's representative, via a dedicated SPOC person (usually, Project Managers), depending on the size and complexity of the projects. In this situation, EPMO will ensure the implementation of a process to yearly notify the Project Managers / ProjectPlace Administrators to update existing information about you, if necessary, and ensure personal data accuracy.

By using ProjectPlace, eu-LISA also gathers information regarding your work activities and workspaces, necessary for the processing operation.

eu-LISA collects your personal data during the entire duration of the contractual engagement with you. On the expiry of such duration, your user access in ProjectPlace will be revoked and you can no longer access the tool. In case of inactivity on the platform for more than 3 months, your account and user access may also be revoked after notifying the allocated workspace Administrator after notifying the allocated workspace Administrator. Be advised that in case you are no longer

assigned on a specific workspace, ProjectPlace Administrators might also restrict your access to that workspace starting from the assignment termination, in which case you will no longer see or access the workspace and information contained.

In order to ensure efficient administration and maintenance of Planview Project Place, your personal information may be processed by eu-LISA ProjectPlace Administrators and/or by Planview Technical Support Team. This processing is necessary to create and/or update your account, manage projects and workspaces, troubleshoot and solve your support inquiries to ensure proper functionality of the platform.

Your personal data will not be used for an automated decision-making including profiling.

Your processed personal data may be reused for the purpose of procedures before the EU Courts, national courts, or the European Court of Auditors.

For the processing operations in Planview Spigit tool (an innovation benchmark platform), accessible from your ProjectPlace user profile ('Feedback' menu), Planview is the sole Data Controller. eu-LISA does not process any information contained or provided by you in this tool. The tool redirects you from ProjectPlace platform to the Spigit platform, automatically creating your account, using the ProjectPlace credentials. For more information about the processing of your personal data, please refer to Planview Privacy Statement. (<https://www.planview.com/trust/privacy/statement/>).

### **3. On what legal ground(s) do we process your personal data**

We process your personal data, because:

- (a) *processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body (Article 5(1) (a) of Regulation (EU) 2018/1725);*

Following the principles of sound financial management laid down in eu-LISA Financial rules (Article 28 and Article 30), the Agency shall ensure efficient and effective use of its resources, ensuring proper mechanisms of internal control allowing transparent use and reporting on resources.

The provision of personal data is mandatory to meet eu-LISA's objectives to ensure the development of large-scale IT systems using an adequate project management structure for efficiently developing those systems, as defined by the Establishing Regulation 2018/1726, art 2(a), Financial Rules of eu-LISA, Article 28 and Article 30 and the contractual requirements for reporting on consumption on time and means specific contract.

- (b) *the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 5(1) (d) of Regulation (EU) 2018/1725);*

Beside the mandatory information required by eu-LISA in ProjectPlace, the tool also contains non-mandatory fields which can collect more of your personal data (workload status, image, capacity in hours and minutes per week, title, about me text, organization, meeting schedules and other personal contact details like another mobile phone or email address, address, city, post code/zip).

eu-LISA does not require you to fill in this information, nor is it necessary for its purposes of processing. However, if you decide to provide some or all of the additional non-mandatory information, you are deemed to consent to processing of such information by eu-LISA as Data Controller and its sub-processors. You can withdraw your consent at any time, by removing the additional information you added.

### **4. Which personal data do we collect and further process?**

In order to carry out the stated processing operation, eu-LISA collects the following mandatory categories of personal data from you in ProjectPlace:

- Name and surname;
- Contact details (email address, department and company);
- Connection details (IP address, session ID, logs);
- Membership to one or more ProjectPlace workspaces;
- Other personal data processed only if applicable, such as comments provided by you as reply to workspace cards, conversations and/or documents, card assignments, documents details (name and time stamp) in case you review them.

Generally, we obtain your personal data directly from you. We can also obtain your personal details from your organization's representative (email address, name) for the initial setup in the platform in order to create your account. Only limited (listed above) personal data is mandatory to meet the stated statutory requirements.

The provision of personal data is mandatory to meet eu-LISA's objectives to ensure the development of large-scale IT systems using an adequate project management structure as defined by the Establishing Regulation 2018/1726, art 2(a), Financial Rules of eu-LISA, Article 28 and Article 30 and contractual requirements for reporting on consumption on time and means specific contract. If you do not provide your personal data, eu-LISA could not report properly on the execution of the Annual Work Programme.

You can also provide on your free consent additional non-mandatory information in your profile, which EPMO does not need or intend to process intentionally and purposefully, but might be viewed by ProjectPlace members and Administrators (workload status, image, capacity in hours and minutes per week, title, about me text, organization, meeting schedules and other personal contact details like another mobile phone or email address, address, city, post code/zip).

## **5. How long do we keep your personal data?**

eu-LISA EPMO only keeps your personal information for the specific retention periods of time described below:

- All the relevant project information is kept for maximum 7 years after the project closure, based on the MFF planning cycle and within the contractual agreement with Planview, with restricted access to the archived workspaces;
- Servers' data and backups of content is deleted after ninety (90) days;
- Operational logs of the service (e.g. user access logs) are kept for 365 days before deleting.
- Planview keeps your personal data along with all projects' related information for the duration of the specific commercial contract between Planview International AB & eu-LISA. Upon expiry of such duration, all data from Planview ProjectPlace will be deleted at the most thirty (30) days adjacent to the termination of a contract.

When determining the maximum retention periods, the Agency takes also into account possible legal recourses, legal, auditing, archiving and reporting obligations.

After the expiration of such retention periods, the files may be transferred to the Historical Archives.

## **6. Who has access to your personal data and to whom is it disclosed?**

Access to your personal data is provided to eu-LISA staff responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Access to your personal data in ProjectPlace is provided to eu-LISA personnel responsible for carrying out the processing operation and to other authorized personnel, according to the "need to know" principle (for instance, your line manager/s, team members in ProjectPlace, ProjectPlace Administrators etc.). Such personnel abide by statutory and, when required, additional confidentiality agreements.

The recipients and/or categories of recipients to which your personal data may be disclosed are:

- Internal:
  - *eu-LISA staff members and Intramuros* for eu-LISA's business management purposes for the collaboration and exchange of information between resources on specific work related to the workspaces they are assigned to;
  - *eu-LISA audit and compliance assigned teams* for the purpose of performing specific audits and checks;
- External:
  - *External end-users* (contractors and/or member states representative) for eu-LISA's business management purposes for the collaboration and exchange of information between resources on specific work related to the workspaces they are assigned to;
  - *External auditing entities* for the purpose of performing specific audits;
  - *Planview Technical Support Team*: in order to ensure efficient administration and maintenance of ProjectPlace. This processing is necessary to create and/or update user accounts, manage workspaces, troubleshoot and solve your support inquiries to ensure proper functionality of ProjectPlace.

The data controller will only transfer some of your personal data to the following recipients in a third country or to an international organization in accordance with Regulation (EU) 2018/1725:

- *Planview International AB*: the technical support teams in US and UK may have access to all the information in ProjectPlace in order to ensure smooth administration and maintenance of Planview ProjectPlace.

The controller will transfer your personal data based on:

- Since there is no adequacy decision of the European Commission applicable for international data transfers to U.S. and U.K., eu-LISA has ensured that appropriate safeguards are in place to protect your personal information, according to Article 48 of Regulation (EU) 2018/1725 through a *Standard Contractual Clauses for Processors*.

The information we collect will not be given to any third party, except to the extent and for the purpose they may be required to do so by law.

## **7. What are your rights and how can you exercise them?**

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a).

You have consented to provide your personal data to *eu-LISA EPMO* for the present processing operation for all the non-mandatory information you may provide yourself. You can withdraw your consent at any time by deleting your personal information from the platform. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor.

## **8. Contact information**

### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns,

or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, eu-LISA, Enterprise Project Management Office (EPMO), Head of EPMO ([eu-lisa-ppm@eu-lisa.europa.eu](mailto:eu-lisa-ppm@eu-lisa.europa.eu)).

- **The Data Protection Officer of eu-LISA**

You may contact the Data Protection Officer ([dpo@eu-lisa.europa.eu](mailto:dpo@eu-lisa.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- **The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.