

## **PROTECTION OF YOUR PERSONAL DATA**

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

### **1. Introduction**

The European 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 "Unified Communication and Collaboration" undertaken by the Corporate Services Department of eu-LISA (CSD) is presented below.

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

Corporate Services Department collects and uses your personal information to facilitate modern, secure, informal corporate online communication and collaboration between eu-LISA core and augmented staff, Member State and EUIs representatives, and externals. Major use cases requiring the processing of personal data are:

- Classical meetings – audio and video conference meetings with optional recording;
- Human resources interviews – audio and video conference meetings;
- Working on large IT Systems – meetings, screen sharing sessions, chats and files exchange to facilitate the usual daily work on the systems developed and under the operational management of the Agency;
- Collaboration and meetings with contractors – communication, collaboration and files exchange with external companies required for the daily work in the Agency;
- Collaboration with representatives of Member States - communication, collaboration and files exchange with representatives of Member States required for the daily work in the Agency;
- Trainings – conducting online training with internal and external participants;
- Events – conducting meetings and presentations with large number of internal and external participants.

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

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

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

We process your personal data, because:

(a) processing is necessary for the management and functioning of the agency;

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

In order to carry out this processing operation Corporate Services Department collects the following categories of personal data:

- Personal information: first name, last name, initials, email address
- Corporate information: organization, department, business email, business phone number, authentication data (user principal name), pseudonymous identifiers
- Audio and video in online conferencing and recordings;
- Electronic communication data, including session ID, device identification, timestamp, user operation;

(for certain use cases)

- Personal information: place of birth, street name and house number (address), postal code, city of residence, country of residence, mobile phone number, gender, date of birth;
- Professional information: education history, current education, grades and results, highest degree achieved, declaration of employment status, recruitment information (such as curriculum vitae, employment history, education history details), job and position data, including worked hours, assessments and salary, work permit details, availability, terms of employment;

The provision of personal data is mandatory to ensure the ability of the users and the Agency to perform its business functions. If you do not provide your personal data, possible consequences are inability to perform required business functions or denial of access to eu-LISA systems.

We have obtained your personal data from the respective responsible entities (File Manager in eu-LISA).

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

Corporate Services Unit only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely:

- Personal data in chats: 1 year
- Personal data in files: 6 months
- Personal data in audio and video recordings: 21 days
- Personal data in security logs: up to 90 days
- Personal data in audit logs: 365 days
- Aggregated pseudonymised usage data in performance logs: 180 days

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

#### **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 supporting 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.

## PUBLIC

The following data recipients will have access to your personal information within the context of this processing activity:

- eu-LISA staff, contractors, representatives of Member States and EU institutions that are member to the meetings or the collaborations groups in which you are participating;
- eu-LISA responsible personnel for the specific business function requiring the processing of your personal data – examples are legal, procurement and human resources personnel;
- eu-LISA IT support teams, eu-LISA IT administration teams and eu-LISA security operations teams have read/write access to collected personal data and derived activity logs;
- eu-LISA data processor's and sub-processors' staff under the explicit control of eu-LISA.

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

If you are accessing Unified Communication and Collaboration tools and services from third countries (outside EU) you should use a Client Virtual Private Network (VPN) solution that terminates within EU geography before connecting to the service; this ensures that your content data is processed only on EU-based infrastructure.

### **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 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 "helpdesk@eulisa.europa.eu"

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

You may contact the Data Protection Officer ([dpo@eulisa.europa.eu](mailto:dpo@eulisa.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.