

EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

1	Title of the processing activity	IT Service Management of the EEAS - MyIT ServiceNow
2	Update of the record (last modification date)	04/01/2024
3	Register reference number	2241
4	Identity and contact details of the Data Controller Joint Controller (if applicable) Data Processor (if applicable)	<p>Controller European External Action Service (EEAS) Directorate/Division responsible for managing the personal data processing operation: EEAS RM.BS.3 @HelloAdmin: Digital Solutions Functional mailbox: RM-BS-3@eeas.europa.eu</p> <p>Processor: ITineris - IT Service Provider for EEAS.RM.BS3 under FWC EEAS-384-DIVA3-SER-FWC-2015 EEAS RM.BS.3 assigned staff EEAS regional IT staff (RITO) contractual agents EEAS local IT agents in Delegations (limited to the region in which they operate)</p>
5	Identity and contact details of the Data Protection Officer	<p>EEAS Data Protection Officer (DPO): Emese Savoia-Keleti. SG.AFFGEN.DPO Functional Mailbox of the DPO: DATA-PROTECTION@eeas.europa.eu</p>
6	Purpose of the processing activity	<p>Purpose(s) of the processing operation: The purpose of the present processing activity is to collect, record and keep information or data including personal data to carry out an efficient IT service management delivery within EEAS.</p> <p>Description of the processing: It includes a set of activities – directed by policies, organised and structured in processes and supporting procedures – that are performed by the Digital Solutions division (RM.BS.3) to design, plan, deliver, operate and control information technology (IT) services offered to EEAS staff. In this context any personal data required to efficiently manage those activities will be processed by the system.</p> <p>Presenting IT services on a website and show their contents in a suitable and effective manner for EEAS users; Offering IT services to EEAS staff; Designing, planning and implementing new IT services; Managing related demands, projects and changes; Diagnosing and resolve technical problems with IT services provided by RM.BS.3; Managing IT service responsibilities and maintain IT service portfolio; Maintaining an up-to-date IT inventory; Management of IT Contractors' work schedules and timesheets.</p>

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7	Legal basis and lawfulness	<p>The processing is necessary for the performance of a task carried out by the European External Action Service in the public interest, in particular for the management and functioning of the EEAS [Article 5(1)(a) of Regulation (EU) 2018/1725] as referred to in Recital 22 thereof in accordance with the following rules:</p> <ul style="list-style-type: none"> IT management rules Mandate for IT systems operation Security rules Other relevant legal base: <ul style="list-style-type: none"> Framework Contracts in place for IT Support and Service Management Addendum to the Agreement: Data Transfer Agreement, Data Processing Annex to the ServiceNow Master Subscription Agreement in pace between EEAS and ServiceNow. Further legal reference: Council Decision of 26 July 2010 establishing the organisation and functioning of the EEAS (2010/427/EU) – OJ L 201, 3/8/2010, p. 30.
8	Categories of individuals whose data is processed - Data subjects	<ul style="list-style-type: none"> Individuals using EEAS IT services <ul style="list-style-type: none"> EEAS staff Other EU institution staff in EU delegations EEAS local agents in Delegations Contractor staff using EEAS IT services Individuals providing IT services: <ul style="list-style-type: none"> EEAS local IT agents in delegations Contractor personnel providing EEAS IT services through ServiceNow - Third party service providers/suppliers contact persons

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9	Categories of data - Data processed	<p>Identification and contact data</p> <p>First name, surname, EEAS and EU login email, professional phone(s), personnel ID, work location (country, city, building, office*), department, job title, grade</p> <p>Manager, VIP status</p> <p>On a voluntary basis following data can be added:</p> <p>Photo, Bio</p> <p>(except for non-disclosure related to security reasons) IT Assets-related data collected from ABAC Assets and our datacentres:</p> <p>Services, computers, software licences, corporate mobile phone, etc. owned by EEAS and attributed to the data subject. Those are processed both manually and in an automated way in the system.</p> <p>IT service-related data</p> <p>Access to the IT services;</p> <p>Services provided to a data subject</p> <p>Time-sheet data of IT contractor personnel</p>
10	Recipients of data – Access to data	<p>The recipients of the data may be</p> <ul style="list-style-type: none"> - Assigned staff of EEAS IT Division (RM.BS.3) - EEAS regional IT staff (RITO) - Assigned staff of EEAS local IT agents and Contractors in Delegations (limited to access data of the Delegation in which they operate) - Assigned external IT staff of the contractor in HQ and Delegations - ServiceNow technical support for issues with the platform
11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	<p>Data are stored in the cloud provided by ServiceNow within the EU (ServiceNow EU DC (Amsterdam/Dublin), a subsidiary of ServiceNow U.S.) ServiceNow also signed Standard Contractual Clauses based on the model of the European Commission. Under no circumstances does ServiceNow have access to the data without explicit preliminary agreement from the EEAS.</p>

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12	Time limit for keeping the data - Retention period	<p>Personal data is kept for a maximum period of 1 year after termination of employment or end of contractual relation with the EEAS. After that period all data subjects' relevant records will be anonymised.</p> <p>In exceptional cases, it can be justified not to anonymise the data records or to anonymise only part of the data. Such instance concerns the situation if the data subject has not returned EEAS assets after leaving the EEAS.</p> <p>For some purposes it might be required to maintain a subset of the data for statistical reasons or to predict future work load based on the data subjects' department or working location.</p>
13	Data Storage	<p>The IT service management is implemented on a cloud service platform from ServiceNow based on a license subscription model. Even though the data is stored on the cloud, it is only accessible to EEAS personnel or subcontracted personnel registered in the EEAS HR system.</p>
14	General description of security measures	please see above.
15	Rights of individuals	<p>The Privacy Statement is available on the landing page of the system and also on the EEAS intranet.</p> <p>Data subjects have the right of access to their personal data and the right to rectify any inaccurate and, taking into account the purpose of processing, to complement incomplete personal data. The right of rectification can only apply to factual data processed. Under certain conditions, data subjects have the right to ask the deletion of their personal data or restrict their use as well as to object at any time to the processing of their personal data on grounds relating to their particular situation. The EEAS will consider the request, take a decision and communicate it to the data subjects. More information is available in Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725. In specific cases, restrictions under Article 25 of the Regulation may apply.</p> <p>Questions can be addressed to the functional mailbox indicated in the Privacy Statement.</p>
16	Information to data subjects	Information to data subjects is provided in a Privacy Statement