



Eurojust record of processing activity



Record of processing personal data activity, based on Article 31 of 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC

Part I –Article 31 Record (this part is publicly available)

Nr.	Item	Description
PRICE Sharepoint Site for storing documents to be linked to ABAC		
1.	Last update of this record	
2.	Reference number [For tracking, please contact the DP Office for obtaining a reference number.]	RD-01 (December 2020)
3.	Name and contact details of controller [Use functional mailboxes, not personal ones, as far as possible - this saves time when updating records and contributes to business continuity.]	Roberto Lenti (Head of Resources Department) rlenti@eurojust.europa.eu
4.	Name and contact details of DPO	dpo@eurojust.europa.eu
5.	Name and contact details of joint controller (where applicable) [If you are jointly responsible with another EUI or another organisation, please indicate so here (e.g. two EUIs with shared medical service). If this is the case, make sure to mention in the description who is in charge of what and whom people can address for their queries.]	N/A
6.	Name and contact details of processor (where applicable) [If you use a processor (contractor) to process personal data on your behalf, please indicate so (e.g. 360° evaluations, outsourced IT services or pre-employment medical checks).]	Authorised staff members from Application Manager and Back Office Teams are the data processors. am@eurojust.europa.eu - monitor for compliance backoffice@eurojust.europa.eu -system performance monitoring, troubleshooting and reconstruction of events

Nr.	Item	Description
7.	<p>Purpose of the processing</p> <p>[Very concise description of what you intend to achieve; if you do this on a specific legal basis, mention it as well (e.g. staff regulations for selection procedures).]</p>	<p>The purpose for the PRICE site in SharePoint is to provide a location where ABAC users can store their documents (all Invoice related documents for payment Authorisation) and can retrieve the links needed to be included in the ABAC workflow. The need for a Document Management System repository for storing the documents and retrieving the links is triggered by the changes implemented by EU Commission in ABAC, where, from 1st January 2021, it will not be possible to directly upload documents anymore, but only to include links in the ABAC workflow. This change is a pre-requisite for the future migration to SUMMA, for which Eurojust is an early adopter with a foreseen migration date in 2022.</p> <p>The data listed below in section 8, are automatically collected for the PRICE site, as they are the standard logs gathered by the EJ DMS system, as detailed in the record of processing activities IMU-02 Processing of Document Management System Audit Logs</p>
8.	<p>Description of categories of persons whose data are processed and list of data categories</p> <p>[In case data categories differ between different categories of persons, please explain as well.]</p>	<p>Eurojust DMS users:</p> <ul style="list-style-type: none"> a. Contribute: <ul style="list-style-type: none"> i. User, ii. Login, iii. Documents, iv. Action, v. Date, vi. Time b. Read only <ul style="list-style-type: none"> i. User, ii. Login, iii. Documents, iv. Action, v. Date, vi. Time

Nr.	Item	Description
9.	<p>Time limit for keeping the data</p> <p>[Indicate your administrative retention period including its starting point; differentiate between categories of persons or data where needed (e.g. in selection procedures: candidates who made it onto the reserve list vs. those who did not).]</p>	<p>Audit logs data collected by DMS, as described in the Record: IMU-02 - Processing of Document Management System audit logs.</p> <p>IMU-02 Processing of Document Management System Audit Logs</p> <p>The audit log data is stored for 30 days in database and Archived in files.</p> <p>Automatic log data trimming. Prior to trimming the data is moved to an excel file and archived in restricted folder in DMS for each site collection.</p> <p>The archived logs files are kept for the duration of 1 year after which they are automatically deleted.</p> <p>Documents saved in the PRICE site:</p> <p>The documents saved on the PRICE site have a retention policy of 5 years, as per EU Financial Regulation (5 years), and 2 additional years as per Eurojust retention policy. In the current set up, there is no automatic deletion of the documents after the end of the retention period; hence, they need to be deleted manually. In the next phases of the project (in 2021-22), a solution for automatic deletion will be analysed and implemented.</p>
10.	<p>Recipients of the data</p> <p>[Who will have access to the data within Eurojust? Who outside Eurojust will have access? Note: no need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS).]</p>	<p>The recipients of the data saved in the PRICE site (i.e. the documents needed for authorising payments in ABAC) are the users with Contributor and /Read only permissions.</p>
11.	<p>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</p> <p>[E.g. processor in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty. If needed, consult DPO for more information on how to ensure safeguards.]</p>	<p>No</p>

Nr.	Item	Description
12.	<p>General description of security measures, where possible.</p> <p>[Include a general description of your security measures that you could also provide to the public.]</p>	<ul style="list-style-type: none"> ▶ Authentication <p>PRICE is a SharePoint site, so the authentication is done via Active Directory. User can only access SharePoint in the EJ Network (on premise or via VPN).</p> <ul style="list-style-type: none"> ▶ Authorisation <p>The Authorisation is granted based on SharePoint permissions.</p> <p>The specific access are granted upon request of the Head of Unit/Service/Sector, in line with the approved DMS Access Policy.</p> <p>Below is the description of the different roles. Further details are available in the Permissions overview PDF attached:</p> <p>Read Only (Assigned to ABAC Authorising Officers and to Auditors): Enables users to only view the documents saved in the folders they have access to.</p> <p>Contribute (Assigned to ABAC Operational Initiators and Verifiers): Enables users to manage personal views, edit items and user information, delete versions in existing lists and document libraries, and add, remove, and update Web Parts for the folders they have access to.</p> <div style="text-align: center;">  </div> <p>Permissions overview Sharepoint v1.pdf</p>
13.	<p>For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:</p> <p>[While publishing the data protection notice is not strictly speaking part of the record, doing so increases transparency and adds no administrative burden, since it already exists.]</p>	<p><i>Data protection Notice attached below:</i></p> <div style="text-align: center;">  </div> <p>Data_Protection_notice_PRICE_2020 v1 021</p>

DATA PROTECTION NOTICE

For processing of personal data in the context of PRICE Site

1. Context and Controller

The purpose for the PRICE site in SharePoint is to provide a location where ABAC users can store their documents (all Invoice related documents for payment Authorisation) and can retrieve the links needed to be included in the ABAC workflow.

As Eurojust collects and further processes personal data, it is subject to Regulation (EU) 2018/1725 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

Collection and processing of personal data from the Document Management System (DMS) PRICE Site is under the responsibility of the Controller, who is the Head of Resources Department and can be contacted at rlenti@eurojust.europa.eu

2. What personal information do we collect, for what purpose, under which legal bases and through which technical means?

Legal basis

The PRICE site needs to be set up based on:

Article 5(1)(a) of Regulation (EU) 2018/1725 where the 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;

Purpose of the processing

The purpose for the PRICE site in SharePoint is to provide a location where ABAC users can store their documents (all Invoice related documents for payment Authorisation) and can retrieve the links needed to be included in the ABAC workflow. The need for a Document Management System repository for storing the documents and retrieving the links is triggered by the changes implemented by EU Commission in ABAC, where, from 1st January 2021, it will not be possible to directly upload documents anymore, but only to include links in the ABAC workflow. This change is a pre-requisite for the future migration to SUMMA, for which Eurojust is an early adopter with a foreseen migration date in 2022.

Technical means

The solution is hosted on Sharepoint, and the data are stored on premises.

Authentication: PRICE is a SharePoint site, and the authentication is done via Active Directory. User can only access SharePoint in the EJ Network (on premises or via VPN).

Authorisation: The Authorisation is granted based on SharePoint permissions.

The specific access are granted upon request of the Head of Unit/Service/Sector, in line with the approved DMS Access policy.

There are two user roles for the PRICE site:

Read Only (Assigned to ABAC Authorising Officers and to Auditors): Enables users to only view the documents saved in the folders they have access to.



Contribute (Assigned to ABAC Operational Initiators and Verifiers): Enables users to manage personal views, edit items and user information, delete versions in existing lists and document libraries, and add, remove, and update Web Parts for the folders they have access to.

Types of personal data

Eurojust DMS users:

- a. Contributor:
 - i. User,
 - ii. Login,
 - iii. Documents,
 - iv. Action,
 - v. Date,
 - vi. Time
- b. Read only
 - i. User,
 - ii. Login,
 - iii. Documents,
 - iv. Action,
 - v. Date,
 - vi. Time

3. Who has access to your personal data and to whom is it disclosed?

DMS logs:

Authorised members of the Back Office and Application Managers Team as data processors;

Data saved on the PRICE site:

The recipients of the data saved in the PRICE site (i.e. the documents needed for authorising payments in ABAC) are the users with Contributor and /Read only permissions.

4. How do we protect and safeguard your information?

All data are stored by Eurojust data on premises. The data centre is secured, with both site and access control, as described in the [Security Controls Policy](#).

[Additionally, personal information collected by the site \(described in section 2\) are regularly deleted as described in the document IMU-02 Processing of Document Management System Audit Logs](#)

5. How can you verify, modify or delete your information?

You have the right to access, rectify or erase or restrict the processing of your personal data or, where applicable, the right to object to processing or the right to data portability in line with Regulation (EU) 2018/1725. In case you wish to verify which personal data is stored on your behalf by the Controller, have it modified, corrected, or deleted, or restrict the processing, or object to it or to



exercise the right to data portability (where applicable), please make use of the following email address: usersupport@eurojust.europa.eu , by explicitly describing your request.

Identification data of individuals can be corrected at any time.

6. How long do we keep your personal data?

DMS logs:

The DMS audit log data is stored for 30 days in database Archived in files.

Automatic log data trimming. Prior to trimming the data is moved to an excel file and archived in restricted folder in DMS for each site collection.

The archived logs files are kept for the duration of 1 year after which they are automatically deleted.

Documents saved in the PRICE site:

The documents saved on the PRICE site have a retention policy of 5 years, as per EU Financial Regulation (5 years), and 2 additional years as per Eurojust retention policy. In the current set up, there is no automatic deletion of the documents after the end of the retention period; hence, they need to be deleted manually. In the next phases of the project (in 2021-22), a solution for automatic deletion will be analysed and implemented.

7. Contact information

Any such request should be directed to the Controller, by using the following email address: usersupport@eurojust.europa.eu , and by explicitly specifying your request.

You may also contact the Data Protection Officer of the Eurojust (dpo@eurojust.europa.eu).

8. Recourse

You have the right of recourse to the [European Data Protection Supervisor \(EDPS\)](https://edps.europa.eu) via email: edps@edps.europa.eu or following the link: https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data.

.