



## 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](mailto: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](mailto: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](mailto: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](mailto: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](mailto:edps@edps.europa.eu) or following the link: [https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en](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.

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