



### 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
<b>Internally Generated (Developed) Intangible Assets (IGIA)</b>		
1.	<b>Last update of this record</b>	<b>First instance</b>
2.	<b>Reference number</b> [For tracking, please contact the DP Office for obtaining a reference number.]	<b>ACC-02 (April 2020)</b>
3.	<b>Name and contact details of controller</b> [Use functional mailboxes, not personal ones, as far as possible - this saves time when updating records and contributes to business continuity.]	Accounting Officer, <a href="mailto:Accounting@eurojust.europa.eu">Accounting@eurojust.europa.eu</a>
4.	<b>Name and contact details of DPO</b>	<a href="mailto:DPO@eurojust.europa.eu">DPO@eurojust.europa.eu</a>
5.	<b>Name and contact details of joint controller (where applicable)</b> [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.	<b>Name and contact details of processor (where applicable)</b> [If you use a processor (contractor) to process personal data on your behalf, please indicate so (e.g. 360° evaluations, outsourced IT services or	Eurojust's Information Management Unit (IMU) and Data Management Unit (DMU)  IMU and DMU collect data on hours worked by staff and external consultants (contractors) for internally generated intangible assets (IGIA). The IGIA are IT-

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	pre-employment medical checks).]	products custom developed for Eurojust (not purchased off-the-shelf). The IT-products in scope are determined after discussion between IMU, DMU and ACC. The data collected is hours spent per IT-product and per phase (research or development).
7.	<p><b>Purpose of the processing</b></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 of this process is to prepare the annual accounts and to comply with legal obligations: Eurojust Regulation, Financial Regulations (General FR, Framework FR and Eurojust FR), International Public Sector Accounting Standards (IPSAS) and EU Accounting Rules, Administrative Director Decision 2011-28.</p> <p>More specifically, we need to comply with the requirements of EU Accounting Rule 6 to capitalize and/or disclose the cost of internally generated (developed) intangible assets (IGIA) – software tools such as CMS, JITs tool, EJ MAP, EJ ART, Eurojust Website.</p>
8.	<p><b>Description of categories of persons whose data are processed and list of data categories</b></p> <p>[In case data categories differ between different categories of persons, please explain as well.]</p>	<p>Categories of persons:</p> <ul style="list-style-type: none"> <li>• Eurojust post holders (Staff, Seconded National Experts, Interims);</li> <li>• Contractors (consultants) working on IGIA;</li> </ul> <p>Data categories:</p> <ul style="list-style-type: none"> <li>• Identification data: name;</li> <li>• Financial information: salary grade, SNE allowance, rate per hour;</li> <li>• Timesheets for hours spent of each contractor (consultant) or post holder per IT-product and per phase (research or development).</li> </ul>
9.	<p><b>Time limit for keeping the data</b></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>The data related to IGIA is electronically archived in DMS for 7 years after the end of the financial year to which it relates, according to the FR.</p> <p>At the end of the retention period the data is manually deleted from DMS by the Accounting Office.</p>
10.	<p><b>Recipients of the data</b></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</p>	<ul style="list-style-type: none"> <li>• Administrative Director, Heads of Departments, Heads of Units, Secretariats and Offices,</li> <li>• Auditors.</li> </ul> <p>The auditors might need to verify that the total cost on IGIA is correct by checking the primary information and</p>

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	investigation (e.g. OLAF, EO, EDPS).]	re-performing the calculations.
11.	<p><b>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</b></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>	No
12.	<p><b>General description of security measures, where possible.</b></p> <p>[Include a general description of your security measures that you could also provide to the public.]</p>	<p>All IT applications at Eurojust are developed according to a standard set of security development guidelines and are thoroughly tested accordingly, to ensure they are robust and reliable.</p> <p>User accesses follow the minimum need-to-know basis to fulfil the purpose, following common rules and managed through controlled access process for established user groups.</p>
13.	<p><b>For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:</b></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>A Data Protection Notice which provides information to data subjects about the exercise of their rights to access, rectify or restrict the processing of their personal data is published on <a href="#">Eurojust website</a> and <a href="#">Intranet</a>.</p>