

#### **PROTECTION OF YOUR PERSONAL DATA**

Processing operation: Technical Help Desk in the context of the EBSI platform

**Data Controller:** European Commission, Directorate General for Communications Networks, Content and Technology (DG CNECT), Unit E.3

Record reference: DPR-EC-06847

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# 1. Introduction

The European Commission (hereafter 'the Commission') is committed to protecting your personal data and to respecting your privacy. The Commission collects and further processes personal data pursuant to <u>Regulation (EU) 2018/1725</u> 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. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation "Technical Help Desk in the context of European Blockchain Services Infrastructure (EBSI) platform" undertaken by the European Commission, Directorate General for Communications Networks, Content and Technology (DG CNECT), Unit E.3<sup>1</sup> is presented below.

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

<u>Purpose of the processing operation</u>: Unit E.3 collects and uses your personal information to provide you with Technical Help Desk services and to support the functioning, improvement and security of the technical support service. This service is provided via the "EBSI" platform (website)<sup>2</sup>.

EBSI platform is built on Atlassian tool stack (JIRA, Confluence, BitBucket, Crowd) and add-ons supported by Atlassian such as Tempo Timesheets for JIRA, Customer Satisfaction Survey for JIRA and Forms for Confluence. You can browse the EBSI platform anonymously. In this case, no registration or login are needed and, with the exception of log data, logged for security purposes (i.e. investigations in case of a (potential) data breach), no personal information is collected or processed.

In case you want to log a request for technical support, you must authenticate yourself via the European Commission's user authentication service known as EULogin (for more information on how your personal data is processed via EULogin, please consult <u>DPR-EC-03187</u>). Atlassian JIRA is then used to store the data from the request in the context of the EBSI platform technical support and for handling of a request (known as ticket). For more information on how your personal is processed via Atlassian Jira, please consult <u>DPR-EC-05186</u>.

By requesting this service through the <u>EBSI Help Desk</u> you can, for example, benefit from the following services:

• Announce the need for technical support;

<sup>&</sup>lt;sup>1</sup> Please note that the controllership for EBSI may pass from the current data controller (European Commission, Directorate General for Communications Networks, Content and Technology (DG CNECT), Unit E.3) to a different controller once EBSI transitions its governance and operations to a new legal entity EBSIC-EDIC. When this is the case, this privacy statement will be updated accordingly.

<sup>&</sup>lt;sup>2</sup><u>https://ec.europa.eu/digital-building-blocks/sites/display/EBSI</u>.

- Be contacted to obtain technical support;
- Be contacted to receive technical trainings;
- Request to become a Node Operator;
- Request to become a conformant Wallet or Application Service Provider;
- Request to integrate a new application to the EBSI Network.

Your contributions to the technical support platform of EBSI are visible only to the technical support team, unless you share the link to your contribution to another user. In case you would like your contributions to be deleted, please contact us at <u>EU-EBSI@ec.europa.eu</u>.

Your personal data will <u>not</u> be used for any automated decision-making including profiling.

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

The processing operation on personal data is lawful under **Article 5(1)(a) of Regulation (EU) 2018/1725** (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). The underlying legal basis is the Regulation (EU) 2021/694 (Digital Europe Programme).

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

In order to carry out this processing operation, Unit E.3 collects the following categories of personal data to the extent that they are necessary:

# Data category: technical helpdesk:

- Name;
- Contact details (e-mail address, telephone number (voluntary), mobile telephone number (voluntary), company and department (voluntary), country of residence (voluntary));

Your first name and family name are published together with your contributions. Your username is visible to any user who receives the link to your contribution. Additionally, you may voluntarily provide other personal data in your request for technical support services.

# Data category: log data:

The following log data is collected whenever you access the EBSI platform for security purposes:

- IP address if it is not masked;
- User agent;
- Timestamp;
- Targeted resource

In addition, the following log data is collected when you are authenticated through EU Login:

• User ID.

These data become part of your EU Login user account.

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

Unit E.3 only keeps your personal data for the time necessary to fulfil the purpose of collection, as detailed below.

### Data category: technical helpdesk:

- Retention period: personal data pertaining to you as a platform user is retained as long as the technical support service is provided to you and will be retained for up to five years after your last request;
- Start date description: personal data is retained as of the moment you made it available;
- End date description: personal data pertaining to you as a platform user is deleted after five years after your last interaction with the technical support service.

### Data category: log data:

- Retention period: personal data connected to your logs is retained for one year;
- Start date description: the data is retained the moment when you access the platform;
- End date description: the personal data related to the log is deleted one year after the accessing of the platform.

You also have the possibility at any moment to modify or cancel your EU Login account (data). In this case, all your platform contributions will be anonymised and you will not have access to the history of your interactions with technical support service without EU Login authentication mechanism.

# 6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the European Commission. All processing operations are carried out pursuant to the <u>Commission Decision (EU, Euratom) 2017/46</u>, of 10 January 2017, on the security of communication and information systems in the European Commission.

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know basis for the purposes of this processing operation.

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

Access to your personal data is provided to the Commission's staff responsible for carrying out the above-mentioned processing operations and to other authorised Commission staff according to the "need to know" principle. All staff abide by statutory, and when required, additional confidentiality agreements.

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as

recipients. The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

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. No international data transfers to third countries take place.

### 8. 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, your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and 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) of Regulation (EU) 2018/1725 on grounds relating to your particular situation.

You can exercise your rights by contacting the Data Controller at EU-EBSI@ec.europa.eu, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

# 9. 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: European Commission, Directorate General for Communications Networks, Content and Technology (DG CNECT), Unit E.3, at <u>EU-EBSI@ec.europa.eu</u>.

# - The Data Protection Officer (DPO) of the Commission

You may contact the Data Protection Officer (<u>DATA-PROTECTION-OFFICER@ec.europa.eu</u>) 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 <u>(edps@edps.europa.eu)</u> 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.

# 10. Where to find more detailed information?

The European Commission's Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: http://ec.europa.eu/dpo-register.

This specific processing operation has been included in the DPO's public register with the following Record reference: **DPR-EC-06847**.