



EUROPEAN COMMISSION

## **PROTECTION OF YOUR PERSONAL DATA**

**This privacy statement provides information about the processing and the protection of your personal data.**

**Processing operation:** CITnet (IT application lifecycle administration & support)

**Data Controller:** European Commission, Directorate General for Informatics (DG DIGIT), Unit B.4 – Software Engineering capabilities (hereinafter referred to as “DIGIT Unit B.4” or “the Data Controller”).

**Record reference:** DPR-EC-05186

### **Table of Contents**

- 1. Introduction**
- 2. Why and how do we process your personal data?**
- 3. On what legal ground(s) do we process your personal data?**
- 4. Which personal data do we collect and further process?**
- 5. How long do we keep your personal data?**
- 6. How do we protect and safeguard your personal data?**
- 7. Who has access to your personal data and to whom is it disclosed?**
- 8. What are your rights and how can you exercise them?**
- 9. Contact information**
- 10. Where to find more detailed information?**

## **1. Introduction**

The European Commission (hereafter 'the Commission') is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to [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 (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 "CITnet" undertaken by DIGIT.B.4 is presented below.

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

CITnet is the Commission's Application Lifecycle Management (ALM) platform. It offers tools for project management, knowledge sharing, software development and testing. It is used by all Directorates-General and EU agencies.

It is built on Atlassian tools stack (Jira, Confluence, Bamboo, BitBucket, Crowd, FishEye) and add-on certified by Atlassian such as Zephyr, BigPicture and Tempo. OSS applications such as SVN, SonarQube and Nexus are integrated with the Atlassian toolset.

Purpose of the processing operation: DIGIT.B.4 collects and uses your personal information to control access to the CITnet platform and to keep a record of user actions on the information stored on the platform.

The user information is used to authenticate users when they connect to the platform, using the European Commission's access control system (EU Login). The users can be allocated into user groups that determine what data the user can access or modify (e. g. if user is added to the "developers" for a certain project he can commit source code to that project).

Please note that this Privacy statement covers the central operations of CITnet. The content of project spaces and its lifecycle is managed by the project teams. CITnet platform administrators cannot monitor the content of the project spaces or perform any manual or automated deletion activities. Therefore, each particular project team is responsible for the processing of personal data that takes place in its project space.

Your personal data will not be used for an automated decision-making including profiling.

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

The processing is performed on the legal basis of Article 5(1) (a) of Regulation (EU) 2018/1725.

We process your personal data, because:

- (a) 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 Public interest includes the processing operations needed for the management and functioning of the European institutions.

The processing is necessary with a view to complying with Article 33.1 (a) (b) and (c) of the Regulation 2018/1046 that refers to the performance and principles of economy, efficiency and

effectiveness.

CITnet is a key component of the “User-centric digital workplace for Commission staff” and “Digital infrastructure” goals of the European Commission digital strategy, which aims to transform the Commission into a truly digital administration.

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

In order to carry out this processing operation, DIGIT.B.4 collects the following categories of personal data:

##### **Identification data**

- Name
- User ID
- email address
- link with the institutions (statutory/intra muros or extra muros, for statutory staff also the organisation/unit/sector)

##### **User activity Logs:**

- the actions the user has performed, such as editing a page or changing an issue.

For EUI staff and intra-muros contractors, this data is fetched from LDAP, where it has been stored when their EUI user account was created.

For extra-muros contractors, a new record in CITnet internal access management system (Atlassian Crowd) is created when they are granted access to the platform.

The provision of personal data is mandatory to meet a statutory obligation. If you do not provide your personal data, possible consequences are lack of access to the platform and inability to fulfil your duties.

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

DIGIT.B.4 only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely as follows:

**Identification data:** Kept until the user is removed from the EC LDAP system or his user account on the platform is deactivated (external users).

If a user asks to remove his/her account, the user info is anonymised and can't be seen any more by other users, with the exception of the user ID that remains in the activity logs of the items that the user has worked on for transparency and security purposes. The user ID will follow the retention period of user activity logs.

**User activity logs:** System logs (containing logs of user action) are deleted after maximum 1 year.

Each item (issue, page etc) contains information about all modifications made on it by different users. All personal data included in each item (issue, page, etc.) and information related to the modifications that took place therein are deleted when the project or when the issue/page/etc. is deleted.

## **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 carried out pursuant to the [Commission Decision \(EU, Euratom\) 2017/46](#) 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 in place. 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 for the purposes of this processing operation.

The data is exchanged with the access management system (EU Login) using encrypted connection (https). The access to the user information is role-based. Therefore, there is a segregation of roles and proper access management policies.

The European Commission has implemented security measures to protect server hardware, software and the network from accidental or malicious manipulations and loss of data. All data is stored on European Commission servers managed by DG DIGIT in line with the technical security provisions laid down in the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission, its subsequent versions, its implementing rules (as adapted from time to time) and the corresponding security standards and guidelines, as well as the Commission Decision (EU, Euratom) 2015/443 of 13 March 2015 on the security in the Commission, its implementing rules and the corresponding security notices.

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

Access to your personal data is provided to the Commission staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The recipients internal to the organisation are:

- Administrators who manage the users' access to the platform and different information (projects, pages, repositories) contained therein.
- Other users of the platform. All users can see each others' name and email address, and also what actions the user has performed, such as editing a page or changing an issue.

The recipients external to the organisation are:

- Other users of the platform. All users can see each others' name and email address, and also what actions the user has performed, such as editing a page or changing an issue.
- In some cases, for support purposes, log files data are sent to Atlassian

DIGIT B4 is not responsible for personal data that may be uploaded by each group that has been created and managed by other EUIs, Agencies or Bodies under their own purposes.

## **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) on grounds relating to your particular situation.

You can exercise your rights by contacting the Data Controller, 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, *DIGIT.B.4, DIGIT-CITNET-SUPPORT@ec.europa.eu*

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

You may contact the Data Protection Officer ([DATA-PROTECTION-OFFICER@ec.europa.eu](mailto:DATA-PROTECTION-OFFICER@ec.europa.eu)) 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 ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) 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 Commission 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-05186.