

Notification to the Data Protection Officer under Article 25 of the Rules on Data Protection (Decision 235/16/COL) ('the Rules')

Changes affecting the information contained in the notification must be notified promptly to the Data Protection Officer, see Article 25(3) of the Rules.

Date of submission: 07.12.2017

Part 1: Processing

- Unit responsible for the processing operation

ADM

- Name of processing operation

General storage of documents in the GoPro case handling system

- General description of the processing operation

Processing of correspondence to and from the Authority:

- Incoming and outgoing emails
- Incoming and outgoing letters and documents
- Metadata on cases
- Contacts, relevant authorities and ministries and their addresses

A case acts as a folder and contains all correspondence related to that case, along with metadata on the case.

- Sub-contractors
- Automated / Manual operations

User accounts are created manually and stored on the server. Reference is also made to the notification on general backup procedures.

- Comments

The storage of documents containing personal data is covered by the notifications covering the processes whereby the personal data are collected and stored. This notification merely supplements those notifications, covering processes and aspects specific to the case handling system, such as the storage and use of user accounts and the access to documents by third parties.

- Security measures

Access for staff members is controlled with a username and password, linked directly to Active Directory authentication where a password policy is in place. All access to cases and documents are logged on the item in question, and access is controlled within the system.

Access to the Portal for exchange of documents at esaportal.eftasurv.int is controlled with specific authentication tokens in a two-step identification process. The tokens are distributed to the ministries of the member states by the EFTA Surveillance Authority, as well as usernames and passwords.

Part 2: Purpose and legal basis

- The purpose(s) of the processing operation

The document and case management system at ESA fulfils a number of essential tasks of the Authority: improve quality of services with case management, support collaboration and workflow features and preserve the institutional memory of the EDPS as a central archive.

- The legal basis of the processing operation

ESA's Manual of Operating Procedures (MOP), the EEA Agreement and EFTA Surveillance Authority Decision 235/16/COL on Data Protection Rules, Article 5(a).

Part 3: Data subjects/fields

- Categories of data subjects

All staff members have an account in the GoPro system, and specific government ministries and institutions have an access to the external portal. The accounts to the portal are only tied to generic email addresses and not to individuals in these organisations.

- Categories of data / Data fields

Full name

User name

Email address

Department

Job title

Picture

Part 4: Rights of the data subjects

- Information to be provided to the data subjects

Privacy Statement of the portal at esaportal.eftasurv.int.

- Procedure to grant rights

Authority procedure for data subject requests (DSR) (document no 863894)

- Retention policy and time limit

Can be found in the notifications for each of the different processes.

Part 5: Recipients

- Categories of recipients of the data

The Member states; Norway, Iceland and Liechtenstein

- Transfer of the data

GoPro Ltd, the provider of the document management system, have access to the system in order to provide support and maintenance.