



Privacy Notice

EUAA Information and Documentation System (IDS) portal on SharePoint Online and site collections

1. Applicable legal framework

The EUAA is fully committed to protecting users' personal data and respect their privacy. The collection and further processing of personal data by the EUAA is carried out in compliance with [Regulation \(EU\) 2018/1725](#)¹ (hereinafter "the EUDPR").

This Privacy Notice explains the reasons 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 (DPO) and the European Data Protection Supervisor (EDPS).

2. How do we process your personal data?

The EUAA does not collect personal information when a user visits the IDS platform unless the user consents to provide such information. An authorised user of IDS Platform is requested to consent to the processing of data related to the user by EUAA in the manner and for the purposes set out below:

a) If the user visits the platform to read, download or consult information:

The EUAA collects information on platform usage (including IP addresses) for the purpose of analysing the use of the platform, compiling analytic reports related to the platform activity and providing other services relating to the platform activity and internet usage. The EUAA will not associate a user's IP address with any other data it holds.

b) If you identify yourself by sending an e-mail containing personal information:

You may send us personal information in an electronic e-mail message. This information is used solely for responding to your requests. If you have any questions about the processing of your e-mail and related personal data, do not hesitate to include them in your message.

c) If you respond to an online request for personal information:

The information requested by the EUAA will be used to respond to your enquiry or to provide you with the service associated with the request. When this information is requested, a specific privacy statement will describe fully the reasons for collecting it and will provide a description of the EUAA's intended use of the information.

3. Which personal data do we collect and further process?

¹. 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, OJ L 295, 21.11.2018, p. 39-98.





Personal data collected and further processed relates to individual persons from EU+ country authorities nominated as the IDS contact points, IDS users and EUAA resources (contract and temporary staff and temporary agency workers relates to the following personal data:

Identification details: name, username, function, organisation, country of residence and e-mail address.

4. Purpose of processing

- Creation of a user account;
- Authentication and/or updating of user credentials;
- Assignment to user permissions and enabling or disabling different levels of access rights;
- Troubleshooting issues with user access rights and ICT related security related issues;
- Monitoring traffic and web analytics related to usage of the platform;

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

The data collected by the EUAA in IDS is shared with the EUAA personnel responsible for the day-to-day operation and maintenance of IDS platform and management of the system, including the EUAA's Centre of Asylum Knowledge, Information and Analysis Sector, the ICT Unit and the IDS network national focal points.

6. What is purpose and legal basis for processing your personal data?

Pursuant to Articles 5, 6, 41(1)(o), 47(5)(l) of the EUAA Regulation², the EUAA has the mandate to gather and analyse information, *inter alia* by creating and maintaining databases and web portals, on the situation of asylum in the Union and in third countries insofar as it might have an impact on the Union, including up-to-date information on root causes, migratory and refugee flows, the presence of unaccompanied minors, the overall reception capacity and resettlement needs of third countries, and possible arrivals of large numbers of third-country nationals which might subject the Member States' asylum and reception systems to disproportionate pressure, with a view to providing timely and reliable information to the Member States and to identifying possible risks to the Member States' asylum and reception systems.

The processing of personal data in the IDS platform is lawful under Article 5(1) point (a) of the EUDPR given that it is "*necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested*" in the EUAA. To the extent that processing of personal data is based on consent obtained by users, such processing is lawful also under point (d) of Article 5(1) of the EUDPR.

7. How long do we keep your personal data?

Personal data related to IDS platform accounts is retained in IDS for as long as the user has access to the platform or until the IDS platform ceases to operate. Retention period is regularly extended or

². Regulation (EU) 2021/2303 of the European Parliament and of the Council of 15 December 2021 on the European Union Agency for Asylum and repealing Regulation (EU) No 439/2010, OJ L 468, 30.12.2021, p. 1-54.



revoked upon periodic review of accounts between the IDS National Contact Points and the Information and Analysis Sector. Users that fall within this category shall be disabled from IDS platforms, thus data are no longer retained in the platform. Personal data is kept for a period of five (5) years in the case of the information needed for reimbursements in thematic meeting networks and events. The first name, last name and email address information will be retained for a period of six (6) months following the disabling of the account from the platform.

8. How do we protect and safeguard your data?

For website security purposes and to ensure that the IDS SharePoint Online platform remains available to all users, network traffic is monitored to identify unauthorised attempts to exploit or change information on this website or otherwise cause damage or conduct criminal activity.

Anyone using this website is advised that if such monitoring reveals evidence of possible abuse or criminal activity, results of such activity might be provided to the appropriate authorities in line with the applicable rules.

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons posed by the processing, the following security measures are applied:

1. The pseudonymisation and encryption of the data;
2. The ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
3. The ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
4. A process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing;
5. Personal data will solely be processed by authorised personnel who are:
 - a. granted access to the personal data on a need-to-know basis;
 - b. familiar with the obligations stemming from the applicable data protection rules;
 - c. regularly trained in the care, protection and handling of personal data;
 - d. authorized to process the personal data; and
 - e. subject to a duty of confidentiality (either as a statutory or contractual obligation);
6. Additional particular security controls: The EUAA ICT has implemented and maintains the following security controls for user data, consistent with global cloud service provider industry best practices, including:
 - a. Controls, Policies & Procedures: Appropriate technical and administrative controls, and organizational policies and procedures;
 - b. Named person in the role as a dedicated Information Security Officer (ISO) with focus on security in all areas of the EUAA business;
 - c. Logging: System and application logging where technically possible, whereas EUAA ICT retains logs for a maximum six (6) months and verifies such logs periodically for completeness;
 - d. Malicious code and/or software: Malware prevention software (e.g. antivirus) is implemented on the technical infrastructure where applicable;



- e. Traffic inspection: Vulnerability exploit inspection is implemented on the technical infrastructure where applicable.
7. System Security: System and IT security controls at EUAA ICT follows industry best practices, including:
- a. A high-level infrastructure diagram, which can be provided upon request;
 - b. A mix of industry standard cloud and software firewalls to dynamically limit external and internal traffic between our services;
 - c. A program for evaluating security patches and implementing patches using a formal change process within defined time limits;
 - d. Ad-hoc penetration testing by an independent third party, with a detailed written report issued by such third party and provided upon request;
 - e. Documentation of identified vulnerabilities ranked based on risk severity and corrective action according to such rank;
 - f. Password policy controls are implemented to protect data, including complexity requirements and multi factor authentication where available.

9. How do we use cookies?

Cookies are small bits of data sent by a website server to the browser on your computer. The browser tells the server when you next visit that particular website.

The EUAA uses cookies to enhance platform performance, store user preferences and gather web analytics. Information from cookies are not used to identify a user personally.

The IDS platform uses [Matomo Analytics](#) (formerly Piwik) to gather website visit information. Information generated by the cookies will be stored on EUAA servers to process usage statistics. By using the EUAA IDS platform, you consent to the processing of your personal data by the EUAA. The IDS platform provides opt-out options to refuse the use of cookies.

Cookies can be deleted, and most browsers can be set to prevent them from being placed. However, preferences will have to be manually entered each time a site is visited, and some services and functionalities may not work.

Cookies help us to store user preferences and track usage trends on an aggregated basis. Read more about [EUAA's Cookie Policy](#) on the EUAA's official website.

As far as login information in particular is concerned, servers automatically record information that your browser sends whenever you visit a website. These server logs may include information such as the date and time of your visit, your Internet Protocol address, browser type, browser language, browser screen size, and one or more cookies that identify your browser. The information we collect is only used to compile statistics, on an aggregated basis, on the usage of IDS platform or to resolve inquiries related to the user's access to the platform and updates of user licences and credentials.

10. What are your rights as a data subject and how can you exercise them?

According to the EUDPR, you are entitled to access your personal data and to rectify it in case the data is inaccurate or incomplete. If your personal data is no longer needed by EUAA or if the processing



operation is unlawful, you have the right to erase your data. Under certain circumstances, such as if you contest the accuracy of the processed data or if you are not sure if your data is lawfully processed, you may ask the Data Controller to restrict the data processing. You may also object, on compelling legitimate grounds, to the processing of data relating to you. Additionally, you have the right to data portability which allows you to obtain the data that the Data Controller holds on you and to transfer it from one Data Controller to another. Where relevant and technically feasible, EUAA will do this work for you.

If you wish to exercise your rights, you may contact the Data Controllers, i.e. the Head of the Situational Awareness Unit (ids@euaa.europa.eu) and/or the Head of the ICT Unit of the Agency (ictu.datacontroller@euaa.europa.eu).

You may always submit queries, remarks or complaints relating to the processing of your personal data to the Data Protection Officer (DPO) of EUAA by using the following e-mail address: dpo@euaa.europa.eu.

In case of conflict, complaints can be addressed to the European Data Protection Supervisor (EDPS) using the following e-mail address: edps@edps.europa.eu.