



EMA/413974/2020

Records of data processing activity for the use of Microsoft Teams and SharePoint Online pilot users (public)

1.	Last update of this record, version number:	25 August 2020, version 1
2.	Reference number:	I2
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of Information Management Division Contact: DWP.DataProtection@ema.europa.eu
4.	Name and contact details of DPO:	dataprotection@ema.europa.eu
5.	Name and contact details of joint controller (where applicable)	N/A
6.	Name and contact details of processor (where applicable)	The contact details of the data processor(s) are the following: Microsoft Corporation ("Microsoft"), Attn: Chief Privacy Officer, 1 Microsoft Way Redmond, WA 98052 USA. A list of Microsoft's current sub processors is available at https://aka.ms/servicesapprovedsuppliers
7.	Purpose of the processing	The purpose of this data processing activity is to allow participants to access and use communication and collaboration functionality in the context of performing Agency tasks, including: Communication and collaboration using Microsoft Teams; Collaboration on documents using Microsoft SharePoint Online; Use of integrated Office 365 functionality within these tools.
8.	Description of categories of persons whose data EMA processes and list of data categories	In this processing operation the personal data of users of Microsoft Teams and/or SharePoint Online (SPO) services at the Agency. Such users include EMA staff members (including contractors) as well as representatives of National Competent Authorities, international partners (international organisations and third country medicines regulators), expert communities.



		<p>The data categories include the following:</p> <ul style="list-style-type: none"> • Username, e-mail address, IP address and profile photo of each authorised user (if applicable); • Any content shared by users, including any personal information, voluntarily posted on the platform; • All 'customer data' collected in the Teams and SPO platforms are stored and protected on Microsoft servers located in the European Union. Customer data is all data, including text, sound, video or image files, and software that you provide to Microsoft or that's provided on your behalf through your use of Microsoft enterprise online services. It includes customer content, which is the data you upload for storage or processing and apps you upload for distribution through a Microsoft enterprise cloud service. For example, customer content includes Teams or SharePoint Online site content, or instant messaging conversations.
9.	Time limit for keeping the data	<p>Personal data will be kept in the database until the respective EMA account has been deactivated, after which the data will be deleted from Microsoft's servers after a 90-day retention period. Deactivation occurs for staff and contractors based on the date of their departure from the Agency, for external users after 6 months of inactivity and after 14 months for experts.</p>
10.	Recipients of the data	<p>The data collected will be processed internally by staff within the EMA Division responsible for Microsoft Teams and SharePoint Online and by Microsoft, for the purposes of providing the service.</p> <p>EMA's Teams and SPO platforms are private and accessible only to active Agency staff, contractors and approved Experts, EU Network users and international partners with a valid EMA Account.</p> <p>A defined population of approved EMA network administrators from within the Agency's Information Management Division (I-Division) and Information Security Service (DED-INS) can temporarily access all exchanges made within the Teams and SPO platforms if there is a legitimate reason to do so, e.g. for the purpose of providing technical support and compliance with applicable terms of use and EMA's code of conduct, for instance to investigate reports of harassment.</p> <p>Information collected on Teams and SPO may, where necessary, be transmitted to the bodies in charge of monitoring or inspection tasks in accordance with European Union legislation.</p> <p>No personal data are transmitted to parties outside the scope mentioned herein, and neither Microsoft nor EMA share personal data with any other third party for any other purpose (e.g. direct marketing).</p>
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<p>N/A: It has been agreed with the data processor that the personal data concerned in this activity will be carried out strictly within the EU/EEA and data will not be subject to international transfers.</p>

12.	General description of security measures, where possible.	Access to Microsoft Teams and SharePoint Online at EMA is integrated with the EMA Identity and Access Management system. Users must authenticate using a secure username and password managed by EMA and access from outside the EMA IT network is protected by multi-factor authentication (MFA). Data is encrypted at rest and in transit.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	<p>Details concerning the processing of your personal data are available on the Agency's website at:</p> <p>https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement</p> <p>Here you may find the EMA General Privacy Statement as well as the privacy statements on specific data processing operations.</p>