



20 March 2023
EMA/123800/2023

Records of data processing activity for the use of Microsoft Edge

1.	Last update of this record, version number:	20 March 2023, version 1
2.	Reference number:	EMA-I-005
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of Information Management Division Contact: Datacontroller.infomanagement@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.
7.	Purpose of the processing	The purpose of this data processing activity is enabling EMA staff and other authorised users (contractors, interims, trainees, scientific experts, Member States' delegates and European Union Institutions (EUIs) staff) to access websites in the context of performing the Agency's tasks, or exceptionally for private use in compliance with EMA internal guidance on the use of internet services whilst connected to the EMA servers. The above includes: <ul style="list-style-type: none">• Accessing web-based applications• General Internet browsing/searching



	<p>Description of categories of persons whose data EMA processes and list of data categories</p>	<p>This processing activity covers EMA staff and other authorised users (contractors, interims, trainees, scientific experts and Member States’ delegates) their use of Microsoft Edge through their EMA account for accessing the internet.</p> <p>The following categories of personal data are processed:</p> <p><u>Required diagnostic data</u> - Microsoft Edge collects a set of required diagnostic data to keep Microsoft Edge secure, up to date and performing as expected.</p> <p><u>Browsing history</u> - Microsoft Edge saves data subjects browsing history, (information about websites they visit), on their device. Depending on their settings, this browsing history is sent to Microsoft, which helps Microsoft find and fix problems and improve their products and services for all users. This information is also used as part of Windows Defender SmartScreen. Windows Defender SmartScreen checks the address of the webpage data subjects are visiting against a list of webpage addresses stored on their device that EMA via Microsoft security services believes to be legitimate.</p> <p><u>Auto-Fill Information</u> - Microsoft Edge can save certain information in order to help and speed up tedious tasks like filling out forms and entering passwords. If data subjects choose to use those features, Microsoft Edge stores the information on their device.</p> <p><u>Cookies</u> - Microsoft Edge also stores cookies, small files that are put on their device as they browse the web.</p> <p><u>Do Not Track Requests</u> - Microsoft Edge will send Do Not Track requests to websites when the Send Do Not Track requests setting is turned on.</p> <p><u>Digital Rights Management (DRM) data</u> - In the exceptional event that data subjects use Edge for private purposes, in compliance with EMA internal guidance on the use of internet services, to protect some video and music content from being copied, some streaming websites store Digital Rights Management (DRM) data on their device, including a unique identifier (ID) and media licenses. When they go to one of these websites, it retrieves the DRM information to make sure they have permission to use the content.</p>
9.	<p>Time limit for keeping the data</p>	<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 30-day retention period.</p> <p>Deactivation occurs for staff and contractors based on the date of their departure from the Agency, for external users, deactivation occurs after 6 months of inactivity, and after 14 months of inactivity for experts.</p>

10.	Recipients of the data	<p>The Agency does not collect any data via Edge.</p> <p>The data collected through Microsoft Edge will be processed internally by staff within the EMA Division responsible for Microsoft Edge and by Microsoft, for the purposes of providing the service.</p> <p>A defined population of approved EMA network administrators from within the Agency's Information Management Division (I-Division) and Information Security Service (AF-INS) can temporarily access all exchanges made within MS Edge if there is a legitimate reason to do so, e.g. for the purpose of providing technical support.</p> <p>Microsoft informs users via this link: Microsoft Edge, browsing data, and privacy</p> <p>Microsoft do not share any personal data with vendors or agents working on their behalf for the purposes described in this statement. Data may be disclosed as part of a corporate transaction such as a merger or sale of assets. Personal data may be shared among Microsoft-controlled affiliates and subsidiaries where this is necessary for the services Microsoft provide.</p> <p>Where assistance is required for technical support Microsoft may request remote screen sharing access. Remote screen sharing access is only requested for the purpose of helping to resolve technical issues and will always take place with the consent and in the presence of the data subject.</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>All customer data is stored and encrypted inside EU/EEA at rest.</p> <p>The only instance where access is granted to Microsoft, from outside of the EU/EEA to any personal data is in instances where assistance is required for technical support. Where this is the case access is only granted to remote screen sharing sessions which take place with the consent and in the presence of the data subject. No access to personal data is granted to any of Microsoft's sub-processors.</p> <p>In addition, as with all Microsoft products, Microsoft does not control or limit the regions from which the customer or its end users may access or move customer data. Therefore, in case an end user travels outside the EU/EEA and uses the services, personal data may be processed outside the EU/EEA to enable the user access to the online services from their location.</p> <p>Microsoft has implemented measures for data transfers (e.g., Standard Contractual Clauses embedded in the Online Services Terms and additional GDPR/EUDPR-specific clauses in the Online Services Terms).</p>

12.	General description of security measures, where possible.	<p>Access to Microsoft Edge 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.</p> <p>To protect personal data of data subjects, EMA has put in place several contractual safeguards complemented by technical and organisational measures.</p> <p>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.</p>
13.	For more information, including how to exercise your rights to access, rectification, erasure, restriction 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> <p>Microsoft Edge Data Protection Notice EMA/123801/2023 https://docs.eudra.org/webtop/drl/objectId/090142b2856359bd</p>