

15 July 2021 EMA/518496/2019

Record of data processing activity relating to managed print services (public)

1.	Last update of this record, version number:	15 July 2021, version 3
2.	Reference number:	A 40
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of the Administration and Corporate Management Division DataController.Administration@ema.europa.eu
4.	Name and contact details of DPO:	dataprotection@ema.europa.eu
5.	Name and contact details of joint controller (where applicable)	Not applicable
6.	Name and contact details of processor (where applicable)	Not applicable
7.	Purpose of the processing	Processing of personal data is necessary in order to operate multifunctional devices (MFDs) for printing, copying and scanning documents in the course of the operation of the Agency.
8.	Description of categories of persons whose data EMA processes and list of data categories	The following categories of data subjects are subject to this processing operation:



		The following categories of personal data are collected for this processing operation:
		Username
		User logon name
		Email address
		Organisational unit/cost centre
		 Print metadata which includes the following personal data:
		o Date of login
		o Time of login
		o Email address
		For delegates at EMA only the following personal data is collected for the processing operation of print release:
		o Date of print
		o Time of print
		o Email address
9.	Time limit for keeping the data	User data: up to a maximum of 72 hours as explained below. In the case of a delegate, the email address of the delegate using the print feature is retained by the MFD server only until the delegate uses the unique code to release the print job. If for any reason, the delegate does not enter the unique one-time only code into any MFD to release the print, then the maximum retention time of the delegate's email is 72 hours.
		Scanned documents: scan data is volatile only and directly sent to the requested destination (internal electronic folder). Scan data is not stored on the server.
		Printed documents – print metadata is stored depending on the configuration of the server. The data is not stored on multifunctional devices (MFD). Standard configuration of the print software i.e. storage of the metadata is limited to up to 72 hours.
10.	Recipients of the data	The data may only be accessed by internal EMA system administrators.
		The fleet of multifunctional devices (MFD) is provided and administered by a company which does not have system administrator rights and has no access to the personal data processed in the system.
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	Not applicable
12.	General description of security measures, where possible.	The Agency has appropriate technical and organisational measures in place to safeguard the security of personal data and ensure the confidentiality, integrity and availability of the relevant systems, services and the personal data processed within them. In particular,

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		 usernames and logon details are stored electronically on a secure network in an electronic records management system, and the request is logged in an internal database;
		 passwords are required to access both systems;
		 the title and content of any documents printed by the MFDs are encrypted and are not visible to the MFD provider;
		 when a user does not have logon details, security is ensured by the use of one-time only unique secure code to release each print job.
1:	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	Details concerning the processing of their personal data are provided to data subjects in the form of a privacy statement internally.

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