



EMA/789752/2022

Records of data processing activity (public) for the Intranet

1.	Last update of this record, version number:	22 September 2022, new version
2.	Reference number:	A 055
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of Administration and Corporate Management Division of EMA, dataprotection.administration@ema.europa.e
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)	Interact Software 5th Floor, 24 Mount St, Manchester M2 3NX, United Kingdom Email: eurep@interactsoftware.com Microsoft Ireland Operations Limited South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland

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Address for visits and deliveries Refer to www.ema.europa.eu/how-to-find-us

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7.	Purpose of the processing	<p>The purpose of this processing activity is the management and enhancement of intranet services in the context of the performance of the Agency's tasks, such as:</p> <ul style="list-style-type: none"> - Promoting effective communication and collaboration among staff within the Agency; - Providing up-to-date information on organisational and operational developments; - Increasing staff engagement in the Agency and corporate/community spirit; - Knowledge-sharing of the mission, work and objectives of the Agency; - Providing easy access to practical information on the Agency's working environment; - Sharing useful information with staff, including social activities. <p>As such, the intranet serves as a 'go to' hub for all colleagues' internal information and communication needs across the Agency. The processing of data is relevant and limited to what is necessary to access and use the Agency's intranet. Personal data in this context are processed for technical purposes and in a professional capacity, such as for logging on, managing roles, recording text that an intranet editor publishes and noting a 'like', 'share' or a comment that a user adds, as well as displaying work-related contact information in the intranet user profiles.</p>
8.	Description of categories of persons whose data EMA processes and list of data categories	<p>In this processing operation, we process data provisioned by three sources:</p> <ol style="list-style-type: none"> 1. Azure Identity and Access Management is the data source primarily used for authentication and also provides the following basic information: first name, surname, username (email), office location, work phone number, manager, and department. It is updated daily. 2. The personal data imported into the Interact intranet from SAP SuccessFactors is listed in the Talent Management Data Protection Notice.¹ 3. Additional information can be knowingly provided by users if they manually edit their profiles under https://intranet.ema.europa.eu/, <i>Your Profile and Settings</i>

¹ The intranet does not currently hold any personal data that data subject cannot see. Even though the option "do not display" exists, it is not in use.

		<p>and <i>Edit Profile</i>. Consent is given by clicking on <i>Save</i> after adding any additional information.</p> <p>Intranet users can have a complete view of the available data fields and the content of these fields cumulatively provided by the data sources listed above by clicking on https://intranet.ema.europa.eu/, <i>Your Profile and Settings</i> and <i>Edit Profile</i>.</p>
9.	Time limit for keeping the data	<p>Personal data is generally retained centrally for as long as a user account is active in the existing EMA Identity and Access Management systems. Your personal data will be deleted after 180 days of inactivity on EMA systems (i.e., if you do not use your account on any of the systems).²</p>
10.	Recipients of the data	<p>The data collected will be processed internally by staff within the EMA Administration and Corporate Management Division responsible for the administration of the intranet.</p> <p>EMA engages a third party, Interact, as data processor to host, manage and maintain the services necessary for the functioning of the intranet. The data processor must ensure that personnel authorised to process personal data have committed themselves to confidentiality or is under an appropriate statutory obligation of confidentiality under the contract signed with the Agency as the data controller. The data processor has put in place appropriate technical and organisational security measures to prevent unauthorised access to personal data.</p> <p>Under the terms of use, EMA can be required to disclose your personal information by law, such as to comply with a judicial proceeding, court order, or legal process.</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>Not applicable</p>
12.	General description of security measures, where possible.	<p>Interact has several security technologies and procedures to ensure customer data is always secure and protected.</p> <p>Interact ensures its products and services are designed in accordance with ISO27001 standards. Interact's existing standards mirror many of the security and privacy requirements of GDPR. Amazon Web Services (AWS), the hosting partner, is also ISO27001 & SSAE16 compliant.</p>

² European Medicines Agency's Privacy Statement for the EMA Account Management system:

		More information are available from here: https://www.interactsoftware.com/security/
13.	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 your personal data are available on the Agency's website at: https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement , where you may find the EMA General Privacy Statement as well as the privacy statements on specific data processing operations.