



21 April 2026  
EMA/188186/2023

## Records of data processing activity for the use of Microsoft Applications: OneDrive, Outlook 365, Teams and SharePoint

1.	Last update of this record, version number:	21 April 2026, Version 2
2.	Reference number:	EMA/188186/2023
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of Information Management Division Contact: <a href="mailto:Datacontroller.infomanagement@ema.europa.eu">Datacontroller.infomanagement@ema.europa.eu</a>
4.	Name and contact details of DPO:	<a href="mailto:dataprotection@ema.europa.eu">dataprotection@ema.europa.eu</a>
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 Ireland Operations Limited One Microsoft Place, South County Business Park, Leopardstown, Dublin 18 D18 P521, Ireland Telephone: +353 (1) 706-3117

**Official address** Domenico Scarlattilaan 6 • 1083 HS Amsterdam • The Netherlands

**Address for visits and deliveries** Refer to [www.ema.europa.eu/how-to-find-us](http://www.ema.europa.eu/how-to-find-us)

**Send us a question** Go to [www.ema.europa.eu/contact](http://www.ema.europa.eu/contact) **Telephone** +31 (0)88 781 6000

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7.	Purpose of the processing	<p>The purpose of this data processing activity is to enable the Agency to function effectively and allow the performance of the following tasks:</p> <ul style="list-style-type: none"> <li>• Collaboration on working documents</li> <li>• Providing a storage depository (for professional and private use)</li> <li>• Enabling electronic communications both internally and externally</li> <li>• Receiving incoming telephone calls (PSTN) to the Agency and the possibility of the recording of these calls for monitoring and training purposes (via Teams)</li> <li>• Allowing outgoing telephone calls (PSTN) from the Agency (via Teams)</li> <li>• Allowing internal telephone calls within the Agency (via Teams)</li> <li>• Supporting audio and video calls and meetings in Microsoft Teams, and the recording of calls/meetings where this is required (EMA will endeavour to inform attendees if a call/meeting is being recorded. Should a participant wishes not to appear in the recording, the participant may turn off the camera.)</li> <li>• Appointment booking functionality (Microsoft Bookings) where it is used in connection with Outlook 365 calendars for scheduling and managing appointment</li> <li>• The use of integrated Office 365 functionality within these tools</li> </ul> <p>Additionally, data are processed as necessary to provide the services and to ensure the security of systems, including for troubleshooting purposes. This includes the provision of technical support and ensuring compliance with applicable terms of use and EMA's code of conduct (see <a href="https://www.ema.europa.eu/en/documents/other/european-medicines-agency-code-conduct_en.pdf">https://www.ema.europa.eu/en/documents/other/european-medicines-agency-code-conduct_en.pdf</a>)</p> <p>Personal data may be used in the context of administrative inquiries and disciplinary proceedings, as further explained in the data protection notice dedicated to this activity, available at <a href="https://www.ema.europa.eu/en/documents/other/privacy-statement-processing-personal-data-context-administrative-inquiries-disciplinary-proceedings_en.pdf">https://www.ema.europa.eu/en/documents/other/privacy-statement-processing-personal-data-context-administrative-inquiries-disciplinary-proceedings_en.pdf</a>.</p> <p>Where EMA receives a request for access from a data subject, the Data Protection Officer and a limited number of authorised and designated staff may access data within Microsoft applications for the purpose of processing and responding such requests.</p>
8.	Description of categories of persons whose data EMA processes and list of	<p><b>Categories of persons whose data EMA processes:</b></p> <p>In this processing operation, the personal data of 'users' of Microsoft Teams, OneDrive, Outlook 365, SharePoint Online (SPO) services at the Agency will be processed. Such 'users' include EMA staff members (including contractors) for OneDrive. Users of Teams, Outlook and SharePoint include EMA staff members (including contractors), representatives of National</p>

data categories	<p>Competent Authorities, international partners (international organisations and third country medicines regulators) and expert communities.</p> <p><b>Data categories Processed:</b></p> <ul style="list-style-type: none"> <li>• Username, e-mail address, IP address, and profile photos for each authorised user (if applicable).</li> <li>• Any content shared by users, including any personal information, voluntarily posted on the platform.</li> <li>• Audio and video calls in Microsoft Teams, processed in 'real time' and meeting/call recordings and/or chat transcription files which can be generated by an internal participant (where meetings are recorded, all meeting participants are informed visually when the recording is initiated during the meeting).</li> <li>• All 'customer data' collected in the Teams, OneDrive, Outlook 365, SharePoint Online (SPO) platforms. Customer data is all data, including text, sound, video, or image files, and software that users provide to Microsoft or that's provided on their behalf through use of Microsoft enterprise online services. It includes customer content, which is the data users upload for storage or processing and apps that are uploaded for distribution through a Microsoft enterprise cloud service. For example, customer content includes Teams or SharePoint Online site content, Teams meeting recordings (participants will be notified where a call/meeting will be recorded prior to the recording starting), or instant messaging conversations.</li> <li>• Appointment details processed through Microsoft Bookings, stored in the organiser's Outlook 365 calendar (e.g. name, email address, selected service, date/time and booking metadata)</li> <li>• For MS Teams PSTN Telephone calls: <ul style="list-style-type: none"> <li>- The telephone number of the caller</li> <li>- The telephone number of the callee</li> <li>- Statistical data of the call such as start and end time, and duration</li> <li>- Usage reports and logs related to calls, such as PSTN usage reports, PSTN blocked users reports, PSTN minute pool reports</li> <li>- Call recording for internal PSTN calls. For more information on this see the separate data protection notice covering this activity: <a href="https://www.ema.europa.eu/en/documents/other/european-medicines-agencys-data-protection-notice-recording-telephone-calls-ema-official-telephone_en.pdf">https://www.ema.europa.eu/en/documents/other/european-medicines-agencys-data-protection-notice-recording-telephone-calls-ema-official-telephone_en.pdf</a></li> </ul> </li> </ul>
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		<ul style="list-style-type: none"> <li>• Service-generated data is information automatically created within Microsoft cloud services, capturing activities performed while using the services. Examples include User Principal Name, pseudonymised user ID, event timestamp (date and time), and event details. Most activities performed by users on the services create service-generated data. Examples of such activities include, but are not limited to, actions performed on a document in SharePoint, the creation and management of channels and teams in MS Teams, and the creation of meeting events in Outlook.</li> <li>• Diagnostic data, which is a category of data collected by Microsoft from software installed on local devices used in connection with the services. Examples of diagnostic data include installed product and version and the installation status; document, feature, and add-in error conditions that may compromise security, including product update readiness; unexpected application exits and the state of the application when that happens. A detailed list of diagnostic data is provided on Microsoft website at this page: <a href="https://learn.microsoft.com/en-us/microsoft-365-apps/privacy/required-diagnostic-data">https://learn.microsoft.com/en-us/microsoft-365-apps/privacy/required-diagnostic-data</a></li> </ul> <p>For Teams architecture:</p> <ul style="list-style-type: none"> <li>• Files shared in channels are stored in SharePoint.</li> <li>• Files shared in ad-hoc chats or meeting chats are stored in the uploader’s OneDrive (“Teams Chat Files”)</li> <li>• Meeting recordings are stored either in the organiser’s OneDrive (private/non-channel meetings) or in SharePoint (channel meetings).</li> </ul>
9.	Time limit for keeping the data	<p>All personal data relating to an EMA account will remain in the cloud storage until the EMA account has been deactivated, after which it will be permanently deleted from Microsoft’s servers after a 30-day retention period, except for OneDrive and its contents, which are permanently deleted 15 calendar days after account deactivation. 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> <p>Users are responsible for deleting any files that are no longer required in line with the principle of storage limitation.</p> <p>Once a user deletes any data from OneDrive, Outlook and Teams and SharePoint Online the data is retained for 30 days before it is purged. For SharePoint sites that are deleted, the retention period is 93 days as it goes through a lifecycle of two recycle bins.</p>

		<p>Where a document is given the label 'record' a retention period will not be applied. The document owner will be responsible for manually deleting the document when it is no longer required.</p> <p>Call recordings for internal PSTN calls are retained for 28 calendar days on a rolling basis after which time they are deleted.</p> <p>Ad-hoc chats (one-to-one) and meeting chats in Microsoft Teams are retained for 6 months, after which they are deleted</p> <p>Where Teams meeting or call recordings are created, recordings are retained by default for 30 days; the expiry date may be amended by the owner, and retention is linked to the storage location and the owner's account status.</p> <p>Where Microsoft Bookings is used, booking information follows Outlook 365 retention rules; when the associated calendar entry is deleted, the booking data is retained for 30 days before being permanently purged by Microsoft.</p>
10.	Recipients of the data	<p><b>Internal Access:</b></p> <p>OneDrive and Outlook 365 are private and accessible only to active Agency staff, contractors with a valid EMA Account.</p> <p>Teams and SPO platforms are also private and accessible only to active Agency staff, contractors and approved Experts, EU Network users and international partners with a valid EMA Account. Only approved and invited participants are allowed to use these platforms within strict controls (see <a href="#">Governance of Microsoft Teams</a>).</p> <p>All colleagues who have shared their files can review, amend or revoke sharing as desired. Owners of the files also have full control to amend these access rights.</p> <p>All colleagues who have joined a particular Teams site can see activity approved within their permissions, which may include posts, replies to comments, 'likes', etc. Permissions are configured on a site-by-site basis by the Teams site owner and can be set at a team, channel or chat level.</p> <p>Messages sent to individual users using the chat functionality can be seen only by the recipient and potentially by network administrators (see following note).</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, Outlook, OneDrive 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 (see <a href="https://www.ema.europa.eu/en/documents/other/european-medicines-agency-code-conduct_en.pdf">https://www.ema.europa.eu/en/documents/other/european-medicines-agency-code-conduct_en.pdf</a>). This includes exchanges in chats that the administrator is not a member of, as well as messages sent using the chat functionality.</p> <p>In regards to access required in relation to an administrative inquiries and disciplinary proceedings, please refer to the EMA data protection notice</p>

covering this processing, (see [https://www.ema.europa.eu/en/documents/other/privacy-statement-processing-personal-data-context-administrative-inquiries-disciplinary-proceedings\\_en.pdf](https://www.ema.europa.eu/en/documents/other/privacy-statement-processing-personal-data-context-administrative-inquiries-disciplinary-proceedings_en.pdf)), as well as the *EMA Management Board Decision on internal rules concerning restrictions of certain rights of data subjects in relation to processing of personal data in the framework of the functioning of the Agency* (see <https://docs.eudra.org/webtop/dri/objectId/090142b2856a0a9f>).

Where EMA receives a request for access to data from a data subject, the EMA Data Protection Officer and a limited number of authorised and designated staff may access data within the Microsoft applications for the purpose of processing and responding to the request.

**External Access:**

Information collected on Microsoft Teams, SharePoint Online, Outlook 365 and OneDrive may additionally, and only where necessary, be transmitted to the bodies in charge of monitoring or inspection tasks in accordance with European Union legislation.

Microsoft and its following sub-processors may process personal data only as is necessary to provide their services:

- Databricks Inc.\*: Who assist with operating and troubleshooting for Azure Databricks (Teams utilises Databricks), located in Canada, France, Germany, Netherlands, United Kingdom and United States.
- Akamai Technologies Inc.\*: Who provide Operating Content Delivery Network (CDN) infrastructure to efficiently deliver content when users connect to the services from a physical location outside the EU, located worldwide.
- Scuba Analytics Inc.\*\*: Who provide customer analytics for Teams, SPOL and OneDrive, located in US.
- Microsoft Contract Staff provided by third parties\*: Who help operate, deliver and maintain the Microsoft Online Services, located in EU, US, Israel and India (all data resides only on Microsoft systems). <sup>1</sup>

\*These sub-processors only have access to pseudonymised personal identifiers.

\*\*These sub-processors only have access to pseudonymised personal data.

Incidentally, Microsoft staff and contract staff provided by third party organisations may need to access customer data and pseudonymised personal data as follows:

- Customer data and pseudonymised personal data transferred out of the EU may be accessed from Australia, India or the United Arab Emirates to perform security operations.
- Customer data and pseudonymised personal data stored and processed in the EU and EFTA can be accessed for the purpose of

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<sup>1</sup> Sub-processor list is correct as of 3<sup>rd</sup> March 2026

		<p>ensuring service resiliency from: Australia, Brazil, Chile, Colombia, Costa Rica, Egypt, El Salvador, Georgia, India, Jordan, Kenya, Malaysia, Mexico, Peru, Philippines, Serbia, Singapore, South Africa, Taiwan and Vietnam.</p> <ul style="list-style-type: none"> <li>Customer data and pseudonymised personal data stored and processed in the EU and EFTA can be accessed for the purpose of ensuring platform system resiliency from: Australia, Brazil, Costa Rica, Egypt, India, Jordan, Malaysia, Serbia, Taiwan, Türkiye and the United Arab Emirates.</li> </ul> <p>For more information on how Microsoft’s sub-processors process personal data please see the below:</p> <p><a href="https://servicetrust.microsoft.com/DocumentPage/aead9e68-1190-4d90-ad93-36418de5c594">https://servicetrust.microsoft.com/DocumentPage/aead9e68-1190-4d90-ad93-36418de5c594</a></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.	<p>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</p>	<p>As regards the location of personal data for OneDrive, SharePoint Online, Teams and Outlook 365, all customer data is stored within the EU/EEA at rest. In certain limited circumstances, data may be processed or stored in datacentres located in the UK, US, Israel, India and Australia, for example for the purposes of security operations. Further information on the applicable exceptions is available on the Microsoft website:</p> <p><a href="https://learn.microsoft.com/en-us/privacy/eudb/eu-data-boundary-transfers-for-all-services">https://learn.microsoft.com/en-us/privacy/eudb/eu-data-boundary-transfers-for-all-services</a></p> <p>Microsoft may temporarily grant access to technical staff and sub-processors located outside EU/EEA where this is necessary to provide their services. Microsoft will only grant either pseudonymised personal data or pseudonymised personal identifiers to its sub-processors. Microsoft’s sub-processors are required to maintain the confidentiality of data and are contractually obligated to meet strict privacy requirements. These sub-processors are also required to meet the requirements of the EUDPR, including those related to implementing appropriate technical and organisational measures to protect personal data. For the full list of sub-processors who may have access to data outside of the EU/EEA and their location, please see section 10 above.</p> <p>The only instance where access to plain personal data is granted to Microsoft itself, from outside of the EU/EEA 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.</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, where an end user travels to outside the EU/EEA and uses the services, personal data may be processed outside the EU/EEA to enable these users access to the online services from their location.</p>

		<p>All user data is stored and encrypted inside EU/EEA regardless if the users connect inside or outside of EU/EEA, subject to the exceptions mentioned above. For authentication purposes, to enable global access, servers may collect identity and authentication data from outside of the EU/EEA. However, this is true for all the MS 365 environment, and includes OneDrive, Teams, Outlook 365, and SharePoint.</p> <p>Microsoft Corporation is certified to the EU-U.S. Data Privacy Framework and all transfers of personal data by Microsoft Ireland are governed by the EU-U.S. Data Privacy Framework and the commitments it entails. Should such transfers not be possible under the Data Privacy Framework for any reason, Microsoft has implemented measures for data transfers (e.g., Standard Contractual Clauses embedded in the Online Services Terms and additional GDPR-specific clauses in the Online Services Terms).</p>
12.	General description of security measures, where possible.	<p>The EMA IT network is protected by multi-factor authentication(MFA). Data is encrypted at rest and in transit.</p> <p>In order to protect personal data, EMA has put in place several strong 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> <p>Microsoft and their sub-processors also ensure technical and organisational measures are in place to protect the confidentiality, integrity and availability of data for more information see <a href="https://www.microsoft.com/en-gb/trust-center/privacy">https://www.microsoft.com/en-gb/trust-center/privacy</a>.</p>
13.	For more information, including how to exercise your rights to access, rectification, erasure, restriction, objection and data portability (where applicable), see the privacy statement:	<p>Details concerning the processing of your personal data and your data subject rights are available on the Agency’s website at:</p> <p><a href="https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement">https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement</a></p> <p>Here you may find the data protection notice regarding this specific data processing operation as well.</p> <p>DPN -MS Suite EMA/188185/2023 <a href="https://docs.eudra.org/webtop/drl/objectId/090142b2856de61c">https://docs.eudra.org/webtop/drl/objectId/090142b2856de61c</a></p>