



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

13 August 2026
EMA/789752/2022

Record of data processing activity for the EMA Intranet (Public)

1.	Last update of this record, version number:	13 August 2026, Version 2		
2.	Reference number:	A-55		
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)	N/A		
6.	Name and contact details of processor (where applicable)	Processor	Activity	Contact Details
		Odyssey Interactive Limited (Interact)	Services related to the function and use of the Agency's intranet	5th Floor, 24 Mount St, M2 3NX, Manchester, United Kingdom security@interactgo.com

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

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

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		Microsoft Ireland Operations Limited	MS 365 services and applications to support EMA's administrative tasks and reporting processes	One Microsoft Place, South County Business Park, Carmanhall and Leopardstown, D18 P521, Dublin, Ireland https://www.microsoft.com/en-us/concern/privacyrequest-msa
		SAP Belgium – Systems, Applications and Products N.V./S.A.	Operation and maintenance of EMA's human resource information system (HRIS) SuccessFactors	Hermeslaan 9, 1831, Diegem, Belgium Privacy@sap.com
7.	Purpose of the processing	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: • promoting effective communication, collaboration and information-sharing among staff within the Agency; • providing up-to-date information on organisational and operational developments; • facilitating the search and filtering of relevant expertise to establish an initial point of contact between staff members and users of the intranet for further development and skills mapping in the Agency; • 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 colleagues, outside of work-related matters, but relevant to the Agency's staff. As such, the intranet serves as a 'go to' hub for all staff members' 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 may add, as well as displaying work-related contact information in the intranet users' profiles.		
8.	Description of categories of persons whose data EMA	Staff members and other contractors that have a profile at the Agency intranet are users of the Intranet. In this processing operation we process data provisioned by three sources: 1. Azure Identity and Access Management is the data source primarily used for authentication and provides also the following basic information: first name,		

processes and list of data categories	surname, username (email), office location, work phone number, manager, and department. It is updated daily. 2. The categories of personal data imported into Interact's intranet from SAP SuccessFactors are listed in the Talent Management Data Protection Notice.¹ 3. Additional information can be provided by users if they manually edit their profile under https://intranet.ema.europa.eu/ > <i>Your Profile and Settings</i> > <i>Edit Profile</i>. This may include: a. Information enabling internal cooperation and information-sharing, i.e. job title, role, specific tasks, expertise, line manager and which organisational entity they work in; b. Any other information added by the user not related to their tasks at the Agency (e.g., information on hobbies added in the biography section). Consent is given by clicking on <i>Save</i> after adding any additional information. 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> > <i>Edit Profile</i>. Personal data already stored by the Agency, and personal data voluntarily provided by users, may be searchable by staff members via the Agency's intranet. In addition, the Agency's intranet team can search for information and may use objective criteria to tailor relevant intranet content which is deemed appropriate for specific audiences. The purpose of this particular processing is to provide a personalised intranet experience and channel information more efficiently to enhance a user's personal journey (e.g., new starters, medical writers, specific divisions). This information 'push' is complemented by a 'pull' technique whereby any user can opt-in by subscribing to topics of interest. To carry out basic functionalities, the service provider (Interact) processes the following categories of personal data: first name, last name, email address, phone number, line manager, department, location. Interact includes a comprehensive suite of analytics reports to support wider adoption of the intranet, which capture page views, profile completeness, 'likes', 'shares', 'subscriptions' and other analytics. Time spent on pages or in the tool is not captured in any report. Analytics reports are available to Interact Power Users of the Agency. Data are retained for the duration of the provider's contract, unless deleted by the Agency. The Interact technical support team will have access to content to provide support and meet Service Level Agreement commitments. Interact operates on 'least privilege' access controls. Access to personal data is only accessible via a token based, time limited and fully auditable access control system.
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¹ The intranet does not currently hold any personal data that data subjects cannot see. Even though the option 'do not display' exists, it is not in use. European Medicines Agency's Privacy Statement for Talent Management EMA/505012/2020 (link available [here](#))

		Additional information is accessible in Interact's Technical Guide on safeguarding customer data² and Data Protection Policy³. To retrieve or see all the data Interact processes, each user can access their 'timeline' (https://intranet.ema.europa.eu/ > <i>My Profile</i> > <i>Recent Activity</i>), which highlights activities within the tool. During a search on the intranet, the Interact processor has introduced limited AI components and personal data of colleagues may emerge and be listed in the query results. These results are clearly indicated as 'AI Search Results'.
9.	Time limit for keeping the data	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) or after your contract with the EMA is terminated. More details are available in the relevant Data Protection Notice on Account Management systems.⁴
10.	Recipients of the data	The data collected will be processed internally by staff within the EMA Administration and Corporate Management Division responsible for the administration of the intranet, members from the Strategic Planning and Budget team, as well as all EMA staff members for the purpose of internal cooperation and information-sharing, the Executive Director and Assistants to Executive Director, the Deputy Executive Director, the Internal Audit Service, the Legal Department, the Data Protection Officer (DPO), in case of internal investigations, audits or other legal proceedings. 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 has committed itself to confidentiality or is under appropriate statutory obligation of confidentiality in accordance with 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. Furthermore, the Agency may share your personal data with the following external institutions, on a need-to-know-basis or when the Agency is required to do so by law, including for monitoring, auditing or inspection purposes in accordance with European Union law: • the European Ombudsman; • the Court of Justice of the EU; • the European Court of Auditors; • the Internal Audit Service (IAS) of the European Commission; • the European Anti-Fraud Office (OLAF);

² Interact Technical Guide on safeguarding customer data, 10 April 2026 (link available [here](#)) and in the vendor's website (link available [here](#))

³ Interact Data Protection Policy, 4 August 2025 (link available [here](#)) and in the vendor's website (link available [here](#))

⁴ European Medicines Agency's Data Protection Notice for the EMA Account Management system EMA/112375/2026 (link available [here](#))

		• The European Public Prosecutor's office (EPPO); and • the European Data Protection Supervisor (EDPS).
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	N/A
12.	General description of security measures, where possible.	Interact has several security technologies and procedures to ensure customer data is always secure and protected. 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. More information is available 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 Data Protection Notice:	Details concerning the processing of your personal data are available on the Agency's website at Data protection and privacy at EMA European Medicines Agency (EMA) and in the specific Data Protection Notice, published at the EMA Intranet.