



3 May 2023
EMA/123947/2023

Records of data processing activity (public) for the use of ServiceNow

The purpose of this data processing activity is to allow stakeholders to raise service requests, incidents, change requests and to support release management and problem ticket management in the context of ISO/IEC 20000 and the Information Technology Infrastructure Library (ITIL) in relation to the IT Services provided by the EMA. Stakeholders can use the service to perform troubleshooting and to allow billing of EMA usage by ServiceNow in the context of performing of the EMA tasks.

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| 1. | Last update of this record, version number: | 31 March 2023, version 1 |
| 2. | Reference number: | EMA/123947/2023 |
| 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) | ServiceNow Luchthaven Brussel Nationaal 1K, Zaventem, Brussels 1930, Belgium |
| 7. | Purpose of the processing | To allow stakeholders to raise service requests, incidents, change requests and to support release management and problem ticket management in the context of ISO/IEC 20000 and the Information Technology Infrastructure Library (ITIL) in |



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| | | <p>relation to the IT Services provided by the EMA. Stakeholders can use the service to perform troubleshooting and to allow billing of EMA usage by ServiceNow in the context of performing of the EMA tasks, including:</p> <ul style="list-style-type: none"> • Raising Service Requests for IT Services offered by EMA • Raising Incident tickets for IT Services offered by EMA • Raising Change requests tickets for IT Services offered by EMA • Release management for IT Services offered by EMA • Raising Internal IT service requests • Facilitating dialogue and internal or external participant engagement in relation to the IT Services provided by EMA, including: <ul style="list-style-type: none"> – Managing questions and answers – Capturing input and feedback from participants on specific topics via surveys <p>The use of ServiceNow is necessary for the day-to-day functioning and management of the Agency, as mandated by EMA’s Founding Regulation (EC) No 726/2004 and other Union legislation.</p> |
| 8. | Description of categories of persons whose data EMA processes and list of data categories | In this processing operation EMA processes data directly collected from data subjects (the data subjects being EMA staff) when they access and use the ServiceNow services. Such data may include: Name, Email Address, Browser, Phone Number (Optional), Mailing Address (Optional), User Information if included in EMA’s Azure Active Directory ¹ , Unique User ID (UUID). |
| 9. | Time limit for keeping the data | The personal data processed in ServiceNow is retained for a maximum of 5 years. This is because there is an operational requirement to retain the data for this period. |
| 10. | Recipients of the data | EMA staff, ServiceNow and the sub-processors used by ServiceNow for the general subscription service, may have access to your data as is required to provide the service. For a |

¹ Azure Active Directory (Azure AD) is a cloud-based identity and access management service. Azure AD enables EMA employees access external resources, such as Microsoft 365, the Azure portal, and thousands of other SaaS applications. Azure Active Directory also helps them access internal resources like apps on EMA’s corporate intranet, and any cloud apps developed for EMA.

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| | | full list of the general subscription sub-processor please see here . |
| 11. | Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards? | <p>EMA has taken all reasonable contractual measures to restrict data transfers to the minimum required by the service, based on additional safeguards, and on condition that enforceable data subject rights and effective legal remedies for data subjects are available.</p> <p>In particular:</p> <ul style="list-style-type: none"> • The service provided to the EMA by ServiceNow is provisioned through ServiceNow’s Protected Platform for the European Union (SPP EU). SPP EU aims to minimise the amount of data transfers that are made to countries outside of the EU. SPP EU assists customers by significantly reducing the number of data transfers to outside the EU when customers are using ServiceNow products. • By default, all data, including User-Generated Information, created by users when they use ServiceNow, is stored in ServiceNow’s data centres within the EEA. • ServiceNow has made substantial improvements to restrict data transfers outside of the EU to situations where they’re critical or under the Customer’s control. There are limited exceptions where data transfers to outside the EU may still occur even when customers participate in SPP EU. • The exceptions to the SPP EU contractual commitment to not transfer EU-hosted personal data out of the EU are limited to the following: <ul style="list-style-type: none"> – Where non-EU access has been approved by the customer in advance. – Where required to prevent or remediate a material issue involving security, data loss prevention, disaster recovery or critical maintenance/service availability. – Where required by law or to prevent fraud or abuse. – Where data is documented in a Support Portal interaction (by or on behalf of the customer), provided that ServiceNow personnel accessing such interactions are located in the EU. Note that Customers can control |

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| | | <p>what data they put or request to be put in the Support Portal.</p> <p>In the case of exceptions to data being processed solely outside the EEA, ServiceNow has put safeguards in place such as Standard Contractual Clauses and technical and organisational measures. Information on ServiceNow's security measures can be found here, more information on the appropriate safeguards used by ServiceNow can be found here.</p> <p>For more information on ServiceNow's commitment to Data Privacy see here.</p> |
| 12. | General description of security measures, where possible | <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> <p>Information on ServiceNow's security measures can be found here.</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 and your data subject rights are available on the Agency's website at: https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement</p> <p>Here you may find the data protection notice regarding this specific data processing operation as well.</p> <p>DPN - ServiceNow EMA/123948/2023 https://docs.eudra.org/webtop/drl/objectId/090142b285662f92</p> |