

I. RECORD OF PERSONAL DATA PROCESSING OPERATION (Art. 31)

1.	Name of the processing operation	Microsoft 365 - Teams-Sharepoint-Outlook online
2.	Reference number/Issue	ETF-DPR-46/Issue 1
3.	Date	08/03/2021
4.	Business owner	Michael Reiner ICT Team Leader Michael.Reiner@etf.europa.eu
5.	Controller	Cesare Onestini Director of the ETF Cesare.Onestini@etf.europa.eu
6.	Joint controller(s)	
7.	Processor(s)	Microsoft Corporation ("Microsoft") and sub processors ETF outsourced support for Microsoft products CERT-EU (Computer Emergency Response Team for the EU institutions, agencies and bodies)
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu

9.	Purpose of the processing	To allow staff (or other persons working for ETF, see details in point 11 Categories of data subjects) to access and use communication and collaboration functionality in the context of performing agency tasks, including <ul style="list-style-type: none"> • Communication and collaboration using Microsoft Teams • Collaboration on documents using Microsoft SharePoint Online • Sending and receiving emails using Microsoft Outlook Online • Use of integrated Office 365 functionality within these tools.
10.	Legal basis for the processing	Regulation (EC) No 1339/2008 establishing a European Training Foundation (recast), article 2 Functions
11.	Categories of data subjects	ETF staff members, including trainees, interim workers and ETF contractors with dedicated ETF email account (e.g. Reception): concerning all tools Invited external participants limited to Teams meetings
12.	Categories of personal data	Username-email address, profile photo (if applicable), IP address Any content shared by users, including any personal information, voluntarily posted on the tools
13.	Time limits for keeping of data	Personal data will be kept until the respective ETF account has been deactivated, after which the data will be deleted from Microsoft's servers after a 90-day retention period. Deactivation occurs for staff and contractors based on the date of their departure from the ETF

14.	Categories of ETF recipients of data	ICT team for configuration
15.	Categories of external recipients of data	Limited data processing is performed by the Microsoft Corporation, pertaining to diagnostics on the use of the Office 365 software tools under the ETF license subscription, to ensure the tools are secure, up to date and performing Microsoft and/or Support contractor may have access to data when, on ETF request, troubleshooting and providing assistance to ETF system administrator
16.	Transfers of data to third country or international	Microsoft may transfer customer data outside the EEA for the purpose of diagnostics and troubleshooting. Transfer destinations are not specified

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	organisation	but any such transfer shall be governed by the Standard Contractual Clauses
17.	Technical and organisational security measures	Only ICT team members have access to Microsoft administration tools management console through secure login
18.	Information to the data subject	Privacy statement

II. COMPLIANCE CHECK AND RISK SCREENING OF PERSONAL DATA PROCESSING OPERATION (Art. 26 and 39)

Name of the processing operation	Microsoft 365 - Teams-Sharepoint-Outlook online
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A. Compliance check

19.	<p>Lawfulness (Legal basis and necessity for processing, point 10)</p> <p><input type="checkbox"/> Necessary for performance of tasks in the public interest attributed by EU or MS legislation</p> <p><input checked="" type="checkbox"/> Necessary for the management and functioning of the organisation</p> <p><input type="checkbox"/> Necessary for compliance with legal obligation incumbent on controller</p> <p><input type="checkbox"/> Necessary for performance of a contract to which the data subject is party</p> <p><input type="checkbox"/> The data subject has given consent</p> <p><input type="checkbox"/> Necessary in order to protect the vital interests of the data subject or of another natural person</p>	Details (if needed):
20.	<p>Purpose definition (Point 9)</p> <ul style="list-style-type: none"> Do you list all purposes? Are the purposes specified, explicit, legitimate? Where information is also processed for other purposes, are you sure that these are not incompatible with the initial purpose(s)? 	<ul style="list-style-type: none"> Yes Yes Not applicable
21.	<p>Data minimisation (Point 12)</p> <ul style="list-style-type: none"> Do you really need all data items you plan to collect? Are there any you could do without? 	<ul style="list-style-type: none"> Yes No
22.	<p>Accuracy (Point 12)</p> <ul style="list-style-type: none"> How do you ensure that the information you process about people is accurate? How do you rectify inaccurate information? 	<ul style="list-style-type: none"> System administration data is input by qualified ICT staff, based on user data in ICT user management system. As the presence of an inaccurate information is signalled, a check is put in place and as applicable relevant rectification is made
23.	<p>Storage limitation (Point 13)</p> <ul style="list-style-type: none"> Explain why you chose the storage period(s) mentioned Are they limited according to the maximum or minimum "as long as necessary, as short as possible"? In case you only need some information for longer, can you split storage periods? 	<ul style="list-style-type: none"> To ensure availability of data during the lifetime of the user at ETF. 90 days after departure to allow for recovery in case of incomplete handover before termination of user at ETF As short as possible N.a.

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24.	Transparency (Point 18) <ul style="list-style-type: none"> How do you tell people about your processing? If you do not want to inform people (or only inform them after the fact), consult your DPO 	<ul style="list-style-type: none"> ETF Privacy statement including copy of Microsoft Privacy Statement Not applicable
25.	Data subjects rights (Point 18) <ul style="list-style-type: none"> Can people contact you if they want to know what you have about them, want to correct or delete the data, have it blocked or oppose to the processing? Could there be situations where you would want to refuse e.g. granting access? In case so please describe them 	<ul style="list-style-type: none"> Yes Potentially in case of unproportioned effort

B. Risk screening

26.	Does the processing involve any of the following?		
	<ul style="list-style-type: none"> Data relating to health, (suspected) criminal offences or otherwise considered sensitive 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> Evaluation, automated decision- making or profiling 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> Monitoring data subjects 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> New technologies that may be considered intrusive 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> Exclusion databases 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> Large-scale processing of special categories of personal data (disease surveillance, pharmacovigilance, central databases for law-enforcement cooperation) 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> Internet traffic analysis breaking encryption 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> E-recruitment tools automatically pre-selecting/excluding candidates without human intervention 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> Management of personal files 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> Staff evaluation procedures (annual appraisal) 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> 360° evaluations for helping staff members develop training plans 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> Staff selection procedures 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> Establishment of rights upon entry into service 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> Management of leave, flexitime and telework 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> Access control systems (non biometric) 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> Video surveillance (limited scale) 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

C. Conclusions

	Actor	Date	Signature
27.	Business owner Michael Reiner ICT Team Leader Conclusion No further action required	3-3-2021	Email validation
	Data Protection Officer: Tiziana Ciccarone / Laurens Rijken Conclusion I confirm that no further action is required DIGIT performed DPIA (v2.4) on adoption of Microsoft Office 365 (on CIRCA), resulting in the following additional measures for EU institutions (including ETF) adhering to DIGIT contract MICROSOFT ILA (DI/07670): - Additional data protection terms, added as custom Data Protection Addendum (DPA) to the contract	4-3-2021	Email validation

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<ul style="list-style-type: none"> - EUDPR-conform "Standard Contractual Clauses" (fall-back for termination of Privacy Shield) - ETF specific list of data subjects and categories (signed by ETF data controller) - Disclosure of list of Microsoft sub processors 		
<p>Data Controller Cesare Onestini, Director of the ETF</p>	<p>8-3-2021</p>	<p>Email validation</p>