

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

1.	Name of the processing operation	Secure European Centralized Address Books & Certificates service (SECABC)
2.	Reference number/Issue	ETF-DPR-78/Issue 1
3.	Date	11/04/2024
4.	Business owner	Strategic Development Unit – Digital Solutions Team Head of Strategic Development Unit of the ETF
5.	Controller	Director of the ETF Director@etf.europa.eu
6.	Joint controller(s)	<i>DG DIGIT is responsible for:</i> <ul style="list-style-type: none"> The development, operation, administration and maintenance of the SECABC platform <i>Participating EUIBAs are responsible for:</i> <ul style="list-style-type: none"> The processing (managing, storing, etc.) of the address book data and secure email certificates made available via the SECABC platform; Keeping the personal data included in the address book and/or certificates of other EUIs secure; Handling security incidents/personal data breaches
7.	Data protection officer	DataProtectionOfficer@etf.europa.eu
8.	Processor(s)	Technical staff of the European Commission Technical staff of the ETF - eServices@etf.europa.eu Technical staff of other participating EUIBAs

9.	Purpose of the processing	To exchange address book information, S/MIME certificates for secured exchange of emails and M365 tenant information (e.g. allowing organising Team meetings across EUIBAs, accessing Corporate sites on MyIntracom of the European Commission and accessing specific intranet sites of European Commission as per set permissions between participating EU Institutions, Bodies and Agencies (EUIBAs) using a single automated IT platform
10.	Legal basis for the processing	Decision 2004/387/EC of the European Parliament and of the Council regarding the IDABC programme, in particular Annex II, section B. Infrastructure Services
11.	Categories of data subjects	Temporary agents, contract agents, interim staff, trainees
12.	Categories of personal data	For exchanging or storing the address book and email certificates: name, email, business phone number, gender code, location, department, institution.
13.	Time limits for keeping of data	Personal data will be stored for as long as a person is staff member of the ETF, and for as long as ETF is participating to the SECABC Platform. Each participating EUIBA can withdraw its authorisation of other participating EUIBAs to receive shared data at any time. Upon withdrawal of authorisation, the receiving Participating EUIBA will delete any received data within one month. In case of termination of the Agreement by all Parties, all Parties shall delete all personal data that have downloaded from the SECABC

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		platform within one month. EC (DG DIGIT) will also delete all data from SECABC within one month.
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14.	Categories of ETF recipients of data	ICT team - Systems and Network admins
15.	Categories of external recipients of data	ETF decides which data to share with which other participating EUIBAs via the SECABC platform. Access to the whole set of personal data undergoing processing is only allowed to authorised staff (including external service providers) of the European Commission to the extent necessary for development, operation, and maintenance of the SECABC platform. The joint controllers shall not outsource the joint processing, or any part thereof, to a processor within the meaning of point (12) of Article 3 of Regulation (EU) 2018/1725.
16.	Transfers of data to third country or international organisation	No international data transfers take place for this processing operation.

17.	Technical and organisational security measures	The SECABC Platform can be accessed and used by the EUIBAs that fulfil the following pre-requisites: <ul style="list-style-type: none"> • Accounts in EU Login • Access to TESTA Network • Own an e-mail system and an M365 Tenant
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	Secure European Centralized Address Books & Certificates service (SECABC)
Reference number	ETF-DPR-78/Issue 1
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Compliance check

19.	<p>Lawfulness (Legal basis and necessity for processing, point 10)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Necessary for performance of tasks in the public interest attributed by EU or MS legislation <input checked="" type="checkbox"/> Necessary for the management and functioning of the organisation <input type="checkbox"/> Necessary for compliance with legal obligation incumbent on controller <input type="checkbox"/> Necessary for performance of a contract to which the data subject is party <input type="checkbox"/> The data subject has given consent <input type="checkbox"/> Necessary in order to protect the vital interests of the data subject or of another natural person 	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"> • Data is input by qualified ICT staff, based on user data in ICT user management system. Staff can indicate necessary corrections to ICT Service Desk. • 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 	<ul style="list-style-type: none"> • The storage is for as long as a person is staff member. The time for deleting of data of one month is the maximum time allowed for processing the deletion

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	<p>minimum “as long as necessary, as short as possible”?</p> <ul style="list-style-type: none"> In case you only need some information for longer, can you split storage periods? 	<p>request</p> <ul style="list-style-type: none"> Limitation is as short as possible with a maximum of 1 month Not applicable
24.	<p>Transparency (Point 18)</p> <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"> Privacy statement is available through ETF Intranet Not applicable
25.	<p>Data subjects’ rights (Point 18)</p> <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 No

Risk screening

26.	<p>Does the processing involve any of the following?</p> <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 Evaluation, automated decision- making or profiling <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Monitoring data subjects <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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 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 Internet traffic analysis breaking encryption <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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 Staff evaluation procedures (annual appraisal) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 360° evaluations for helping staff members develop training plans <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Staff selection procedures <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Establishment of rights upon entry into service <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Management of leave, flexitime and telework <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Access control systems (non biometric) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Video surveillance (limited scale) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Conclusions

	Actor	Date
27.	<p>Business owner</p> <p>Strategic Development Unit – Digital Solutions Team Head of Strategic Development Unit of the ETF</p>	<p>2-4-2024</p>

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	Conclusion No further action required	
	Data Protection Officer: Conclusion I confirm that no further action is required	2-4-2024
	Data Controller Director of the ETF	10-4-2024