## **EMCDDA Personal Data Protection Record on Documenta**

| Nr.  | Item  |   |
|--|---|---|
| Header - versioning and reference numbers (recommendation: publicly available) |   |   |
|  | Last update of this record  | 24 May 2021   |
| 1.   |   |   |
|  | Reference number:   | DPO-046   |
| 2.   |   |   |
| Part 1 -   | Article 31 Record (recommer   |   |
| 3.   | Name and contact details of controller  | Controller: EMCDDA, Praça Europa 1, Lisboa, Portugal<br>Contact: Ms Rosemary Martin de Sousa, Head of Communication<br>unit, EMCDDA; ECID project owner<br>ECID@emcdda.europa.eu  |
| 4.   | Name and contact details of DPO   | Mr. Ignacio Vázquez Moliní, DPO, EMCDDA dpo@emcdda.europa.eu  |
| 5.   | Name and contact details of joint controller (where applicable)   |   |
| 6.   | Name and contact details of processor (where applicable)  |   |
| 7.   | Purpose of the processing   | The purpose of the processing is the functioning of the platform for Document management and collaborative editing, mainly internally among EMCDDA staff, and with selected external stakeholders.  |
| 8.   | Description of categories of persons whose data EMCDDA processes and list of data categories  Time limit for keeping the data | Categories of persons: EMCDDA staff, and selected external stakeholders The categories of personal data dealt with during any call for this EMCDDA record are the following:  A. Accessible by authenticated users  Surname  Given name  job title  email  and voluntary data provided by the user, like a profile picture, or company, phone number, mobile phone number, but also skills, interests, passions and birthday, and an about section  B. Accessible by system administrators  IP address (automatically collected)  In addition, depending on decisions concerning usage of the system for EMCDDA internal processes, contents stored on the system could contain other personal data, which would refer to those data protection records. Access rights in Documenta are very specific and exclude even EMCDDA system administrators  Electronic data will be stored in the EMCDDA's files as follows: |
| 9.   | Time limit for keeping the data   | Basic user account information is kept for the duration of the user's rights to access the system; He/she can decide to delete everything beyond that. Username may be kept beyond for associated information that users created or commented on as long as the system exists     IP addresses are kept in log files and log data for technical support only and for matters of access statistics,  |

|     | Recipients of the data   | The recipients of the data are:   |
|-----|--|---|
| 10. |  | All EMCDDA and system users (profile data only)   |
|     |  | In case personal data are entered as contents, only users working on<br>the related processes would be recipients, as defined in the<br>appropriate record  |
| 11. | Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?                      | NO  |
| 12. | General description of security measures, where possible.  | The data collected is stored in electronic format on designated EMCDDA equipment. Users have to be actively registered by the EMCDDA as users (no self-registration or ad-hoc user creation by team members). User access is limited to the EMCDDA network or (from 1 June 2021) with two-factor authentication.  Access rights are defined by each team for documents of a specific process, and secured documents cannot be accessed by system administrators |
|     |  | Audit records collect data about any access or change, visible to system administrators  A penetration test was contracted and carried out to ensure security and provide guidance on system hardening.   |
| 13. | For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement: | https://documenta.emcdda.europa.eu/user   |