

01 - Name of processing	Azure Active Directory at ERA	
02 - Reference	74	
03 - Submission Date	02-05-18	
04 - Last update	24-05-21	
05a - Controller	RICOTTA Salvatore	
05b - Unit-Sector	ITFM	
05c - Controller's email	HoUResourcesandSupport@era.europa.eu	
06 - DPO	DataProtectionOfficer@era.europa.eu 120 Rue Marc Lefrancq, 59300 Valenciennes, France Tel.+33 (0) 32 70 96 500	
07 - Name and contact details of joint controller (where applicable)		
08a - Who is actually conducting the processing? (Article 31.1(a))	The data is processed by a third party (e.g. contractor) (Art. 29 – Processor)	
08b - Name and contact details of processor (where applicable)	For cloud-based services related to Microsoft Azure Active Directory, Microsoft acts as data processor. Contact details: Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland https://docs.microsoft.com/bs-cyrl-ba/compliance/regulatory/gdpr-data-protection-officer	
09 - Purpose of processing		
The data processing is mainly related to the creation, modification and deletion of the information related to the user account.		
10a - Data Subjects		
Statutory and Non-statutory staff that have been granted an ERA user account and stakeholders that have been granted an ERA-EXT user account.		
10b - Personal data	<p>The collected personal data are the following:</p> <ul style="list-style-type: none"> AccountEnabled (defines if an account is enabled or not), AssignedLicenses (license Skuld), AssignedPlans (product), City (Valenciennes), CompanyName (European Union Agency for Railways), Country (France), Department (Unit), DisplayName (FirstName LastName), GivenName (FirstName), JobTitle (Title), Mail (email address), MailNickName (SAMAccountName), Mobile (mobile number), 	<ul style="list-style-type: none"> OnPremisesDistinguishedName (X.400 user ID) PhysicalDeliveryOfficeName (Office Number), PostalCode (59300), ProxyAddresses (X.500 and SMTP mail addresses), SipProxyAddress (same attribute as email address), State (Nord), StreetAddress (120, rue Marc Lefrancq) Surname (LastName), TelephoneNumber (Landline number), ThumbnailPhoto (Picture), UsageLocation (FR), UserPrincipalName (The UPN is the login ID for the user and equivalent to the email address).

11 - Time limit for keeping the data

For ERA internal users As long as the relationship between the Agency and the Data Subject exists.

After the separation date, data is kept in the Active Directory for a period of 90 days, before its deletion, months after the deletion in logs and back-up media For external users

As long as users are recorded as active. If the user is registered through a third party, the period of activity will usually correspond to a contractual link with that party, but the Agency will consider the user active as long as it continues to receive user's information (in the case of an automatic link) or until user's account expires.

After the expiration date, data is kept in the Active Directory for a period of 30 days, before its deletion, 6 months after the deletion in logs and back-up media

In case of incident the data will be kept for analysis for a longer period to establish evidence or to defend a right in a legal claim pending before a court.

12 - Recipients of the data

The recipients of the personal data are:

Authorised Agency staff dealing with the provisioning of Azure Active Directory accounts, Microsoft's personnel managing the databases on Microsoft cloud servers and their sub-processors' personnel on a need-to-know basis.

All recipients of the data are reminded of their obligation not to use the data for any further purpose other than the ones for which they were collected.

The personal information collected will not be communicated to third parties.

In case there is the need to share your data with third parties, you will be notified with whom your personal data has been shared.

Microsoft Corporation, as processor, is committed under the terms of the Interinstitutional License Agreement and related documents to respect the obligations of the GDPR. The nature and the purpose of the processing is related to the provision of the Online Service pursuant to Customer's volume licensing agreement.

In compliance with the terms of the Art. 27 of the GDPR, Microsoft Ireland Operations Limited is Microsoft's representative in the European Union that offers c

13 - Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?

Yes

Transfers of personal data outside the European Union are not foreseen. However, diagnostic data covered by contractual rules may be sent to Microsoft outside EU territory.

Transfer subject to appropriate safeguards (Article 48.2 and .3) – Standard data protection clauses as per Inter-Institutional License Agreement signed by the EU Commission and Microsoft.

Microsoft commits to have in place written agreements with all sub-processors that are at least as restrictive in terms of data protection and security as their data processing agreement with the EC. The activities of all sub-processors are in scope of third-party audits.

14 - How is data stored? What are the security measures implemented?

All personal data in electronic format are stored either on the servers of the Agency's in its premises or alternate site or in Microsoft datacentres in the EU (linked to the Agency's set environment). All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

In order to protect your personal data, the Commission (who represented the Agency in the negotiations with Microsoft) has put in place several strong contractual safeguards, complemented by technical and organizational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorized 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 authorized persons with a legitimate need to know for the purposes of this processing operation.

The Agency is actively configuring customer data location (at rest) of the contracted Microsoft's services. The online services the Agency will use are offered from data centres in EU Member States, respectively Austria, Finland, France, Germany, Ireland, the Netherlands. No content data will be stored outside the EU territory.

Any log files generated by using Microsoft Azure Active Directory can be analysed in the US, and while the Commission (and hence the Agency) cannot technically avoid this, strong contractual safeguards apply to this data. Any data in transit is protected by strong encryption.

The Commission (who represented the Agency in the negotiations with Microsoft), has taken legal and technical measures to protect personal data that are transferred outside the EU/EES according to Chapter V of Regulation 2018/1725.

15 - For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable) see the data protection notice

Microsoft Azure Active Directory will be provisioned to all Data Subjects (Statutory and Non-statutory staff) that will be informed about the use of the related features and its purpose through informative sessions. Informative materials will be made available.
The relevant Privacy Statement is available on the Intranet and on the Extranet.

15a - Data subject rights

Right to have access; Right to rectify

16 - Legal Basis

Rules 2.1 Identity and Access Management;#52

17 - Lawfulness of processing

Article 5 a) of Regulation (EU) 2018/1725

18 - Data minimisation

Minimum set of data to create a user account

19 - Accuracy

All the information related to the data subjects are checked and validated against the user accounts notation.

20 - Threshold assessment

NA

21 - Special category data

Not applicable

22 - DPIA

23 - Link to the Threshold assessment-Risks

24 - Other related documents