

EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

1	Title of the processing activity	Processing of personal data of users and administrators related to Mobile Device Management (MDM)
2	Update of the record (last modification date)	03/01/2024
3	Register reference number	3241
4	Identity and contact details of the Data Controller Joint Controller (if applicable) Data Processor (if applicable)	European External Action Service Rond Point Schuman 9A, 1046 Brussels, Belgium RM.BS.3, Digital Solutions Division Functional mailbox: RM-BS-3@eeas.europa.eu
5	Identity and contact details of the Data Protection Officer	EEAS Data Protection Officer (DPO): Emese Savoia-Keleti. SG.AFFGEN.DPO Functional Mailbox of the DPO: DATA-PROTECTION@eeas.europa.eu
6	Purpose of the processing activity	<p>The purposes of the processing activity related to Mobile Device Management (MDM) are as follows:</p> <ul style="list-style-type: none"> Enabling users to synchronise their e-mails and other services between their mobile equipment and the EEAS servers. Ensuring security of EEAS data and communication on mobile equipment (corporate and private) of EEAS staff including account management Enabling automatic update and/or upgrade of applications and systems To control the applications installed on the corporate partition Monitoring of device compliance and telemetry is implemented to guarantee security, in particular availability of the service and, in case of corporate devices, to monitor usage of corporate mobile accounts. Providing for measures to secure/erase EEAS official content from mobile devices of EEAS staff in case of risks (for example stealth or loss of device) or end of contract/employment without unjustified interference into their private contents.

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7	Legal basis and lawfulness	<p>The processing of personal data is necessary for the performance of a task carried out by the EEAS in the public interest, in particular for the management and functioning of the EEAS, including the security of ICT systems [Article 5(1)(a) of Regulation (EU) 1725/2018] as referred to in Recital 22 thereof.</p>
8	Categories of individuals whose data is processed - Data subjects	<p>End-users of the devices (when they enrol for mobile device management and during usage). The administrators of the MDM solution</p>
9	Categories of data - Data processed	<p>Identification data and data of accounts of the users</p> <p>Usage data (telemetry, location and other traffic and usage data like applications installed etc.)</p> <p>Pseudonymized data is associated with a unique identifier, typically a number generated by the system that cannot on its own identify an individual person but is used to deliver the enterprise services to users.</p> <p>Aggregated data is used to provision and improve the service.</p>
10	Recipients of data – Access to data	<p>EEAS Administrators of Mobile Device Management, including staff members of Digital Solutions (BS.3) as well as colleagues responsible for local IT management in EU Delegations</p> <p>Assigned technical and security staff of the EEAS</p>
11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	

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12	Time limit for keeping the data - Retention period	<p>In general, personal data is retained until 30 days after the user is removed from mobile device management.</p> <p>Telemetry data collected as part of usage is retained for a maximum of 30 days.</p> <p>Audit logs are retained for up to one year.</p>
13	Data Storage	Data are stored on the mobile devices and on secure servers of the EEAS in protected data centres of the EEAS
14	General description of security measures	
15	Rights of individuals	<p>Data subjects have the right of access to their personal data and the right to correct any inaccurate or incomplete personal data. The right of rectification can only apply to factual data processed. Under certain conditions, data subjects have the right to ask the deletion of their personal data or restrict their use as well as to object at any time to the processing of their personal data on grounds relating to their particular situation.</p> <p>The EEAS will consider the request, take a decision and communicate it to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary. Data subjects are informed in the Privacy Statement that they can find more information in Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725.</p> <p>In specific cases, restrictions under Article 25 of the Regulation may apply. If you wish to exercise your rights or have questions concerning the processing of your personal data, you may address them to the Data Controller via @HelloAdmin: Digital Solutions or via the functional mailbox RM-BS-3@eeas.europa.eu</p>
16	Information to data subjects	<p>A specific Privacy Statement is available for data subjects on the intranet. The Privacy Statement is also attached to related communication.</p> <p>A User's Charter for Corporate Mobile Device is also prepared and available for Data Subject to have access to corporate smartphones or tablets whereby users undertake to abide by terms and conditions designed to ensure that the device is used effectively, securely, appropriately, and economically and in accordance with requirements of protecting personal data, including own data and data of EEAS staff and of external individuals.</p>