

## Data Protection Notice on Electronic Log File Management

### 1. Introduction

Personal data gathered in the course of electronic log file management are processed in accordance with [Regulation \(EU\) 2018/1725 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data](#) (or Regulation (EU) 2018/1725)<sup>1</sup>.

The Head of the Information & Communication Technology Unit is the staff member responsible for this processing operation on behalf of the data controller (i.e. Eurofound).

### 2. Why do we process your personal data?

Eurofound maintains automated machine-based mechanisms which monitor and log network, email, Internet traffic, Internet activities and incoming/outgoing telephone connections.

The purpose of processing is, thus, to ensure that Eurofound ICT systems work the way they should and to minimize the unavailability of such systems. In particular, personal data is processed to detect and prevent attacks.

### 3. Which personal data do we collect and process?

The following data may be processed:

- Call monitoring data: user email, destination email, destination and incoming phone, date and time;
- Firewall Log files: source IP, IP destination, date and time;
- Email system log files: email address sender and recipient, name sender and recipient, subject, send time, SMTP path, date, message-id, bcc, cc and content type;

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<sup>1</sup>. OJ L 295 21.11.2018, p. 39-98.

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- Domain system monitoring: username, action, date and time workstation name;
  - Proxy server SSL: source IP destination IP/DNS, duration, date/time; and
  - Other identification data: name, unit, room, telephone number, email address and office address.

#### **4. What is the legal basis for processing your personal data?**

The processing of personal data is necessary for the management and functioning of Eurofound<sup>2</sup>, namely to respond to security incidents as described in the ICT policies, in particular in the Eurofound Electronic Information Security Policy.

#### **5. Who has access to your personal data and to whom is it disclosed?**

For the purpose detailed above, access to personal data is provided to the following processing entities:

- Designated members of ICT Team.
- External recipients: in case of security investigation, Eurofound may transfer monitoring logs to external experts (in particular, CERT-EU).

No other third parties will have access to your personal data, except if required by law.

#### **6. How long do we keep your personal data?**

Data will be kept for three months or longer in case a security investigation process is open. In this case, data will be kept until the investigation is closed.

#### **7. How do we protect and safeguard your data?**

Eurofound has implemented measures to protect information resources, including access control systems, antivirus software, testing and back-up of information.

#### **8. Do we transfer any of your personal data to third countries or international organisations (outside the EU/EEA)?**

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<sup>2</sup> Article 5(1) (a) and recital (22) of Regulation (EU) 2018/1725

No.

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**9. Does this processing involve automated decision-making, including profiling?**

No decision is taken by Eurofound in the context of this processing activity solely on the basis of an automated processing of your personal data (i.e. processing without human intervention).

**10. What are your rights as a data subject and how can you exercise them?**

Within the limits set by Regulation (EU) 2018/1725, you have the right to access, rectify, erase and/or port your personal data, as well as to restrict or object to the processing of your personal data.

In order to exercise your rights, please contact the Head of the Information & Communication Technology Unit ([Jim.Halpenny@eurofoundeuropa.eu](mailto:Jim.Halpenny@eurofoundeuropa.eu)) whereby you shall specify your claim (i.e. the right(s) you wish to exercise). The exercise of your rights is free of charge. If your request is manifestly unfounded or excessive, Eurofound may refuse to act on it.

**11. Can your rights be restricted?**

Pursuant to the Decision no. 21 of the Management Board of Eurofound adopting internal rules concerning restrictions of certain rights of data subjects in relation to the processing of personal data in the framework of the functioning of Eurofound<sup>3</sup>, your rights can be restricted for the following purposes:

- Important objectives of general public interest of the Union or of a Member State, in particular the objectives of the common foreign and security policy of the Union or an important economic or financial interest of the Union or of a Member State, including monetary, budgetary and taxation matters, public health and social security<sup>4</sup>;

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<sup>3</sup> Adopted 20 December 2019.

<sup>4</sup> Article 25(1) (c) of Regulation (EU) 2018/1725.

- Internal security of Union institutions and bodies, including of their electronic communications networks<sup>5</sup>;

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- Monitoring, inspection or regulatory function connected, even occasionally, to the exercise of official authority in the cases referred to in points (a) to (c) of paragraph 1 of Article 25 of Regulation (EU) 2018/1725<sup>6</sup>; and
  - Protection of the data subject or the rights and freedoms of others<sup>7</sup>.

The above restrictions may apply to the following rights: right of information to be provided to the data subject, right of access, rectification and erasure of personal data and right of restriction to the processing of personal data.

The restrictions can also apply to the obligation imposed upon Eurofound of communicating a personal data breach to the data subjects affected<sup>8</sup>, as well to the obligation of ensuring the confidentiality of electronic communications<sup>9</sup>.

## 12. Right of recourse

Should you feel that the processing infringes the data protection rules, you are entitled to raise a [complaint with the European Data Protection Supervisor](#).

## 13. Who shall I contact in case of doubts?

Should you have any question or doubt on this processing operation, you should contact the Head of the Information & Communication Technology Unit ([Jim.Halpenny@eurofoundeuropa.eu](mailto:Jim.Halpenny@eurofoundeuropa.eu)).

You may always submit queries, remarks or complaints relating to the processing of your personal data to Eurofound's Data Protection Officer (DPO) at [dataprotectionofficer@eurofound.europa.eu](mailto:dataprotectionofficer@eurofound.europa.eu).

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<sup>5</sup> Article 25(1) (d) of Regulation (EU) 2018/1725.

<sup>6</sup> Article 25(1) (g) of Regulation (EU) 2018/1725.

<sup>7</sup> Article 25(1) (h) of Regulation (EU) 2018/1725.

<sup>8</sup> Article 35 of Regulation (EU) 2018/1725.

<sup>9</sup> Article 36 of Regulation (EU) 2018/1725.

