

## RECORD OF PROCESSING ACTIVITIES

*Record of processing activities with administrative personal data based on Article 31 of Regulation 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies applicable to Europol in accordance with Article 46 of the Europol Regulation*

### Part I – Public Information

<b>Q1</b>	<b>Last Update of the record</b>	12 November 2020
<b>Q2</b>	<b>Reference number</b>	<b>EDOC # 1115809</b>
<b>Q3</b>	<b>Data controller</b> <i>Contact details</i>	Governance Directorate Head of Department G2 - Institutional and Legal Affairs <i>G2@europol.europa.eu</i>
<b>Q4</b>	<b>Data Processor</b> <i>(if applicable)</i> <i>Contact details</i>	<u>Contractor:</u> Motiv IT Masters BV Utrechtseweg 34E 3402 PL IJsselstein The Netherlands  <u>Subcontractor:</u> Evidos B.V. Prinsessenhof Amalia Zijlweg 148A 2015 BJ Haarlem The Netherlands
<b>Q5</b>	<b>Joint controller</b> <i>(if applicable)</i> <i>Contact details</i>	Not applicable
<b>Q6</b>	<b>Data Protection Officer</b>	<i>dpo@europol.europa.eu</i>
<b>Q7</b>	<b>Name of processing activity</b>	Electronically signing documents with external parties
<b>Q8</b>	<b>Purpose of processing</b>	Personal data of Europol internal and external signatories is processed, to electronically conclude legal commitments between Europol and external parties by means of electronic signature.

## Europol Public Information

		<p>Besides the signatories, personal data of Europol internal users is processed when initiating signing workflows and monitoring their progress.</p> <p>In addition, strong user authentication requires processing of personal data of all users. Finally, solution administration, usage monitoring and audit logging process to some extent also personal data.</p>
<b>Q9</b>	<b>Data categories</b>	<p> <input checked="" type="checkbox"/> Name                      <input type="checkbox"/> Address  <input type="checkbox"/> Date of birth,              <input type="checkbox"/> Place of birth  <input type="checkbox"/> ID/ passport no.          <input type="checkbox"/> Marital status  <input type="checkbox"/> Gender                      <input checked="" type="checkbox"/> Email address  <input checked="" type="checkbox"/> Phone no.                  <input type="checkbox"/> Name employer  <input type="checkbox"/> Personnel number      <input type="checkbox"/> Function         </p> <p>Other (please, specify):</p> <p>In addition, IP addresses of signatories are logged by the system when signing documents.</p>
<b>Q10</b>	<b>Description of categories of persons</b>	<p> <input checked="" type="checkbox"/> Europol - All Staff  <input type="checkbox"/> Europol - Contractors  <input type="checkbox"/> Europol - Law Enforcement Officers  <input type="checkbox"/> Europol - Liaison Officers  <input type="checkbox"/> Europol - Seconded National Experts  <input type="checkbox"/> Europol - Task Force Officers  <input type="checkbox"/> Europol - Trainees &amp; Interns  <input checked="" type="checkbox"/> Others:         </p> <p>Legal representatives of Europol external parties.</p>
<b>Q11</b>	<b>Time limit for keeping the data</b>	<p>Documents are stored in the e-signature solution only temporarily for the purpose of signing them. The signing workflows and their content are deleted automatically after 30 days.</p> <p>Audit logs are subject to automatic deletion (in general after 6 months).</p> <p>Specific security logs related to the creation of the electronic signature are kept until their deletion is requested by Europol.</p> <p>Users and the related personal data can be created and deleted at any time by the company administrator. Users will be deleted when their business need to access the system expires.</p>

## Europol Public Information

<p><b>Q12</b></p>	<p><b>Recipients of the data</b></p>	<p>Electronically signed documents and the related transaction documents are accessible to the workflow initiator and the internal / external signatories of the signing workflow, which they initiated or to which they are assigned. These actors can also monitor the progress of the respective signing workflow.</p> <p>Internally, data about users is visible, to company administrators at Europol. They also have access to dashboard reports, which contain data about actions performed by the users.</p>
<p><b>Q13</b></p>	<p><b>Transfer to third countries or international organisations</b></p>	<p><input checked="" type="checkbox"/> NO</p> <p><input type="checkbox"/> YES:</p> <p style="padding-left: 20px;">Name third party I:</p> <p style="padding-left: 20px;">Place of third party:</p> <p style="padding-left: 20px;">Contact details:</p> <p style="padding-left: 20px;">Legal basis transmission:</p> <p style="padding-left: 20px;">Does the recipient processes data on behalf of Europol <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Safeguards established:</p>
<p><b>Q14</b></p>	<p><b>General description of security measures</b></p>	<p>Authentication of users and signatories is based on two-factor authentication.</p> <p>The cloud based e-signature solution is hosted in a Dutch data centre, which is operated by a Dutch IT security company (Motiv).</p> <p>Information stored and data transferred is encrypted.</p> <p>Audit logs are created and cleaned automatically.</p> <p>Specific data protection provisions are included in the contract with Motiv.</p>
<p><b>Q15</b></p>	<p><b>How data subjects can exercise their rights to access, rectification, object and data portability (where applicable)</b></p>	<p>Data subjects (e.g. users and signatories) are informed about the e-signature solution, its functionalities and the personal data processed in coordination with the DPF by:</p> <ol style="list-style-type: none"> <li>1) targeted trainings, briefings and email messages;</li> <li>2) a Privacy Notice, Use Policy and extract of the Record of Processing Activities;</li> </ol>

**Europol Public Information**

		<p>3) a detailed User Guide, which refers to the Use Policy and Record of Processing Activities;</p> <p>The data subject can request deletion of his/her personal data from the e-signature solution at any time.</p> <p>The data subject can exercise their rights by sending an e-mail to the Europol data controller: G2@europol.europa.eu.</p>
--	--	--