



## Eurojust record of processing activity

Record of processing personal data activity, based on Article 31 of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC

### Part I –Article 31 Record (this part is publicly available)

Nr.	Item	Description
<b>EventsForce is cloud based system used at Eurojust for:</b> <ul style="list-style-type: none"><li>• Events registration management (inviting attendees, self-registration, etc.)</li><li>• Collecting information for hotel booking</li></ul>		
1.	<b>Last update of this record</b>	July 2020
2.	<b>Reference number</b> [For tracking, please contact the DP Office for obtaining a reference number.]	<b>ELU-02 (July 2020)</b>
3.	<b>Name and contact details of controller</b> [Use functional mailboxes, not personal ones, as far as possible - this saves time when updating records and contributes to business continuity.]	Head of Events & Logistics Unit Contact email address: <a href="mailto:dpevents@eurojust.europa.eu">dpevents@eurojust.europa.eu</a>
4.	<b>Name and contact details of DPO</b>	<a href="mailto:dpo@eurojust.europa.eu">dpo@eurojust.europa.eu</a>
5.	<b>Name and contact details of joint controller (where applicable)</b>	n/a

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	<p>[If you are jointly responsible with another EUI or another organisation, please indicate so here (e.g. two EUIs with shared medical service). If this is the case, make sure to mention in the description who is in charge of what and whom people can address for their queries.]</p>	
6.	<p><b>Name and contact details of processor (where applicable)</b></p> <p>[If you use a processor (contractor) to process personal data on your behalf, please indicate so (e.g. 360° evaluations, outsourced IT services or pre-employment medical checks).]</p>	<p>The service is provided by Eventsforce, address: The Wenlock, 50-52 Warf Road, London, N1 7EU, UK. <a href="https://www.eventsforce.com/">https://www.eventsforce.com/</a></p> <p>The service was acquired via EU Commission supplier of ICT equipment and services Insight Technology Solutions Belgium INC,</p> <p>The contract details are as follows: SPECIFIC CONTRACT N° 08 implementing Framework Contract n° DI/07722 (SLG.AVT.DI07722)</p> <p>For Eventsforce Privacy policy, please consult <a href="https://www.eventsforce.com/privacy-policy/">https://www.eventsforce.com/privacy-policy/</a></p>
7.	<p><b>Purpose of the processing</b></p> <p>[Very concise description of what you intend to achieve; if you do this on a specific legal basis, mention it as well (e.g. staff regulations for selection procedures).]</p>	<p>The purpose of the processing activity via EventsForce is to manage meeting registration. During the registration process, details such as e.g. participants' personal data, accommodation details (when applicable), dietary requirements (when applicable), travel reimbursement (when applicable), are collected both for internal and external participants. The data is used in the preparation of coordination meetings, events organized by the Networks with the Secretariats posted at Eurojust and other Eurojust meetings, e.g. Consultative Forum, Counter-Terrorism, Migrant Smuggling, etc.</p>
8.	<p><b>Description of categories of persons whose data are processed and list of data categories</b></p> <p>[In case data</p>	<p>The data of external and internal attendees is collected during the registration process related to an event.</p> <p>Category A (the personal data set by default):</p> <p>The following data is currently logged as Personally Identifiable Information within EventsForce system:</p> <ul style="list-style-type: none"> <li>- First Name</li> </ul>

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	<p>categories differ between different categories of persons, please explain as well.]</p>	<ul style="list-style-type: none"> <li>- Last Name</li> <li>- Corporate E-mail address (no control whether it is private or business)</li> <li>- Corporate CC email address</li> <li>- Corporate Address</li> <li>- Corporate Town</li> <li>- Corporate Postal code</li> <li>- Corporate Phone number</li> <li>- Work phone number</li> </ul> <p>Category B (personal data added to the default set by Eurojust):</p> <p>The following type of data will be added to the above listed data and logged as Personally Identifiable Information within EventsForce system:</p> <ul style="list-style-type: none"> <li>- Registration on behalf of a participant</li> <li>- Title (Ms/Mr)</li> <li>- Function</li> <li>- Organisation (Company)</li> <li>- Country</li> <li>- Reimbursement (eligible for)</li> <li>- Reimbursement Country</li> <li>- Dietary requirements</li> </ul> <p>Other dietary requirements (allergies or dietary preferences like kosher, halal, etc.)</p> <ul style="list-style-type: none"> <li>- Participants List (approval)</li> <li>- Participants List Output (selection)</li> <li>- Picture (approval)</li> <li>- Work fax number</li> <li>- Car Model</li> <li>- Car Plate</li> <li>- Contact Points List (EJN Plenaries)</li> <li>- Plenary Observers List (EJN Plenaries)</li> <li>- Speaker (category for different events like Genocide, CF)</li> <li>- Speaker Country (category for different events like Genocide, CF)</li> <li>- Speaker reimbursement (category for different events like Genocide, CF)</li> </ul> <p>Category C (other event related data):</p> <p>The following type of data is also collected within EventsForce system, depending on the requirements of a specific event. This data will be deleted from the system 1 year after the date of an event:</p> <ul style="list-style-type: none"> <li>- Videoconference (attending via)</li> <li>- Hotel/Accommodation (overnight needed)</li> <li>- Hotel Check In</li> </ul>

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		<ul style="list-style-type: none"> <li>- Hotel Check Out</li> <li>- Accommodation Comments</li> <li>- Second Night (accommodation)</li> <li>- Type of room (accommodation)</li> <li>- Special requirements (accommodation)</li> <li>- Meal attendance</li> <li>- Meal attendance 2nd day</li> <li>- PPT</li> <li>- Parking</li> <li>- Shuttle Airport</li> <li>- Shuttle Dinner</li> <li>- Meeting Day 1 Attendance (for events like 2 days CMs, EJ Meetings &amp; Networks)</li> <li>- Meeting Day 2 Attendance (for events like 2 days CMs, EJ Meetings &amp; Networks)</li> <li>- Closed session Attendance ((for events like Genocide)</li> <li>- Cultural programme Attendance (for events like EJM Plenaries)</li> <li>- Welcome Reception Attendance (for events like EJ Meetings &amp; Networks)</li> <li>- Dinner Attendance (for events like EJ Meetings &amp; Networks)</li> <li>- Lunch Day 1 Attendance (for events like 2 days CMs, EJ Meetings &amp; Networks)</li> <li>- Lunch Day 2 Attendance (for events like 2 days CMs, EJ Meetings &amp; Networks)</li> <li>- Workshops/Subgroups Selection (for events like EJ Meetings &amp; Networks)</li> </ul>
9.	<p><b>Time limit for keeping the data</b></p> <p>[Indicate your administrative retention period including its starting point; differentiate between categories of persons or data where needed (e.g. in selection procedures: candidates who made it onto the reserve list vs. those who did not).]</p>	<p>The data of external and internal attendees is collected during the registration process related to an event.</p> <p>The participants' personal information is retained for 3 months (Category A and B). After that period the records are automatically anonymized and deleted by the system. The retention period is managed by IM application management team upon ELU request.</p> <p>The Category C data will be deleted from the system 1 year after the date of an event.</p> <p>As the process of collecting all relevant information for the reimbursement and the process of refunding might last up to 3 months; the retention period is set accordingly.</p> <p>The anonymized data needs to be retained for 6 month in order to ensure all relevant reports are compiled for annual reporting and for all activities planning purposes</p>

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10.	<p><b>Recipients of the data</b></p> <p>[Who will have access to the data within Eurojust? Who outside Eurojust will have access? Note: no need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS).]</p>	<p>The information about the meetings participants is accessed by:</p> <ul style="list-style-type: none"> <li>• IM Application Managers are authorized to managed Eurojust account; the account used by IM AM for management EJ account do not have permission for accessing participants records;</li> <li>• Organizing desk and/or meeting owner.</li> </ul> <p>The provider of the services EvetsForce together with the sub-supplier (cloud services) the Iron Mountain, have no access to the personal data as all information is encrypted when being in rest (i.e. stored within the cloud service storage) and stored. The encryption keys are available only to the users of the service (IM system administrator).</p> <p>Tape backups are encrypted by our hosting providers (Rackspace).</p>
11.	<p><b>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</b></p> <p>[E.g. processor in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty. If needed, consult DPO for more information on how to ensure safeguards.]</p>	<p>No</p> <p>Currently the data centre is located in UK; the company already started to move it to Republic of Ireland in order to maintain the compliance with EU data protection regulations.</p>
12.	<p><b>General description of security measures, where possible.</b></p> <p>[Include a general</p>	<p>Risk Assessment Report has been compiled by ICT Security Service. The scope of this risk assessment encompassed the use of the EventsForce web application and the underlying technical solution supporting it. The risk assessment also encompassed the business processes related to the use of EventsForce. To facilitate the risk</p>

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	description of your security measures that you could also provide to the public.]	<p>assessment, the IM Project has gathered the necessary information from EventsForce and from the business owners and users at Eurojust.</p> <p>The objective of this risk assessment was the following: To identify the threats and vulnerabilities introduced by using the EventsForce web applications; To define the security requirements to mitigate the identified risks.</p> <p>Seven security requirements were identified and appropriate measure were implemented.</p> <p>The measurers for protecting the data are as follows:</p> <ul style="list-style-type: none"> <li>- Access to the information <ul style="list-style-type: none"> <li>o Access to EventsForce can be controlled either via username and password authentication, or by using an external authentication service.</li> <li>o Role-based access control allows individual users to be restricted to particular functions or particular events</li> <li>o EventsForce is a database-integrated application and therefore holds all events and personal level data within its own database.</li> <li>o Data in the database can only be accessed through the EventsForce web interface or through the EventsForce API.</li> <li>o Backups are stored offsite at a facility managed by Iron Mountain; which is supplier of cloud based backup services in UK and other countries (including The Netherlands). More information is available on web site <a href="https://www.ironmountain.nl/">https://www.ironmountain.nl/</a> and privacy policy is available via this link <a href="https://www.ironmountain.nl/utility/legal/privacy-policy">https://www.ironmountain.nl/utility/legal/privacy-policy</a>.</li> </ul> </li> <li>- Data Encryption: <ul style="list-style-type: none"> <li>o All traffic between EventsForce servers and client browsers is sent using HTTPS (TLS 1.1 or higher).</li> <li>o This ensures the highest level of security when viewing and entering data on a web page.</li> <li>o Client data is encrypted at rest using AES-256 encryption.</li> <li>o Tape backups are encrypted by the hosting provider (Rackspace) using AES-256-GCM encryption.</li> <li>o Rackspace manages the encryption keys on behalf of EventsForce.</li> </ul> </li> <li>- Physical protection <ul style="list-style-type: none"> <li>o EventsForce provides a hosted and managed service for customers.</li> <li>o The servers are hosted at a Rackspace data centre in the UK.</li> </ul> </li> </ul>

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		<ul style="list-style-type: none"> <li>○ EventsForce will not move hosting outside the UK or to a hosting provider without ISO27001 certification without prior approval from customers.</li> <li>○ Backups are stored offsite at a facility managed by Iron Mountain; which is supplier of cloud based backup services in UK and other countries (including The Netherlands). More information is available on web site <a href="https://www.ironmountain.nl/">https://www.ironmountain.nl/</a> and privacy policy is available via this link <a href="https://www.ironmountain.nl/utility/legal/privacy-policy">https://www.ironmountain.nl/utility/legal/privacy-policy</a>.</li> <li>○ Only authorised Rackspace employees have physical access to EF servers.</li> </ul> <p>- Suppliers security certification</p> <ul style="list-style-type: none"> <li>○ Rackspace holds ISO 27001:2005 (Information Security) and ISAE 3402 certification for its UK data centre and is approved by Visa as a Compliant Level 1 Payment Card Industry (PCI) Service Provider.</li> <li>○ Iron Mountain maintains SysTrust (The SysTrust service is an assurance service that was jointly developed by the American Institute of Certified Public Accountants (AICPA) and the Canadian Institute of Chartered Accountants (CICA). It is designed to increase the comfort of management, customers, and business partners with systems that support a business or particular activity. In a SysTrust engagement, the practitioner evaluates and tests whether or not a specific system is reliable when measured against three essential principles: availability, security, and integrity. SysTrust is based on the common framework of the Trust Services Principles and Criteria) Certification and Payment Card Industry security framework Compliance.</li> </ul>
13.	<p><b>For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:</b></p> <p>[While publishing the data protection notice is not strictly speaking part of the record, doing so increases transparency and</p>	<p>The <a href="#">data protection notice</a> is sent alongside the meeting invitation to all potential attendees and published on Eurojust website.</p>

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	adds no administrative burden, since it already exists.]	