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)

No.	Item	Description
	Library circulation (loans and reservations of physical items) and management of electronic resources. ExLibris' Alma is a library software system for managing the acquisition, sharing, cataloging, and use of all kinds of resources, including physical and digital books, physical and digital periodicals, and digital resources. Primo is ExLibris' user-facing library, providing centralized and personalized access to all library resources in Eurojust. Users can locate physical and digital resources with availability information for physical resources (including the ability to request these resources for checkout) and instant online access to digital resources.	
1.	**Last update of this record**	**03/10/2023**
2.	**Reference number** [For tracking, please contact the DP Office for obtaining a reference number.]	**CCU-10**
3.	**Name and contact details of controller** [Use functional mailboxes, not personal ones, as far as possible - this saves time when updating records and contributes to business continuity.]	Head of Corporate Communications Unit EU Agency for Criminal Justice Cooperation **Contact details:** **Postal address: P.O Box** 16183 2500 BD the Hague, The Netherlands **Telephone: 0031 70 412 55 25** **Email:** DP_comms@eurojust.europa.eu
4.	**Name and contact details of DPO**	Data Protection Office dpo@eurojust.europa.eu
5.	**Name and contact details of joint controller (where applicable)** [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	

No.	Item	Description
	queries.]	
6.	**Name and contact details of processor (where applicable)** [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).]	ExLibris (Deutschland) GmbH Tasköprüstrasse 1 22761 Hamburg Germany dpo@exlibrisgroup.com
7.	Purpose of the processing [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).]	The purpose of processing personal data for the library is to: - Create and manage the user accounts to allow the requests for reserving and borrowing physical and digital library resources to authorised users, as well as tracking the Library collection - Address troubleshooting and conduct incident investigations as needed.
8.	**Description of categories of persons whose data are processed and list of data categories** [In case data categories differ between different categories of persons, please explain as well.]	Administrative personal data are processed of Eurojust post holders both for the front-end (Primo VE) and back-end (Alma) interface: - Name and middle name (if used), - Surname(s), - Eurojust email address, - IP address (Eurojust public IP address if connected via VPN, device's own IP address if not connected via VPN) Both individual users and library staff can access their own data by logging in with username and password to the system. The password shall be compliant with Eurojust / ICT Security recommendations. Library staff with administrator permissions can edit and correct inaccurate personal data manually. Alma supports an audit trail of changes for security reasons: - Time and date when the change was made, - Who made what changes, - All changes made to user records. ExLibris' personnel can access cloud servers where the name, surname, and email address of the user are saved, or the database for troubleshooting or maintenance purposes, upon Eurojust request, without causing any security issues for the personal data stored in the database.

No.	Item	Description
9.	**Time limit for keeping the data** [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).]	The administrative personal data of individuals mentioned in point #8 above, are kept in the library management system as long as they have an active Eurojust email account. The data of post holders who leave Eurojust is deleted upon signature of the Exit form (Eurojust exit procedure).
10.	**Recipients of the data** [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).]	Data described in point #8 above, Eurojust post holders: name (and middle name), surname(s), Eurojust email address, will be available to the EJ library staff and ExLibris. On request from post holders (usually administrative assistants), the Library provides information on the current loans or another post holder in the same desk or unit. This is done with the knowledge of the post holder and usually serves the purpose of making the exit process easier.
11.	**Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?** [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.]**	Yes. Supplier shall only employ sub-processors established and processing the personal data in the EEA, Israel or in another third country for which a valid adequacy decision within the meaning of Art. 47 under Regulation (EU) 2018/1725 was issued, i.e. Japan, south Korea, the United Kingdom and the United States of America.
12.	**General description of security measures, where possible.** [Include a general description of your security measures that you could also provide to the public.]	Alma and Primo are ExLibris SaaS solutions. The SaaS services for customers headquartered in the EU are hosted in data centers located in the EU. ExLibris provided sufficient security assurance and proportional to the information in scope of the engagement. The overall risks identified by ICT Security remain low with regard to the possible impact to Eurojust. However, application of soft control with regard to password security has been recommended by ICT Security. All personal data is encrypted and can only be decrypted through the Alma application itself. Furthermore, every interaction with the cloud server is meticulously logged and monitored using dedicated monitoring and logging tools.

No.	Item	Description
13.	**For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:** [While publishing the data protection notice is not strictly speaking part of the record, doing so increases transparency and adds no administrative burden, since it already exists.]	Data subjects can exercise their rights as is described in the Data Protection Notice. For administrative personal data, the data subjects can send an e-mail regarding the administrative personal data to usersupport@eurojust.europa.eu.