



## **Privacy Statement on personal data protection for Trusted Meetings Service and Platform at the EMCDDA**

The EMCDDA has implemented a self-hosted platform and service to run SENSITIVE web conferencing meetings, both internal and with external stakeholders according with Regulation (EC) No 1920/2006 on the European Monitoring Centre for Drugs and Drug Addiction. Any data collected or information provided by persons within this platform will be processed in accordance with [Regulation \(EU\) 2018/1725](#).

This Regulation concerns the protection of natural persons with regard to the processing of personal data provided to the European Union institutions and bodies and on the free movement of such data. In compliance with Articles 15 and 16 of the Regulation, the EMCDDA provides all the concerned persons with the following information:

The Controller<sup>1</sup> of the data is the Head of the Information and communication technology Unit. In order to contact the controller please do it in writing to the following e-mail address: ICT-HOU@emcdda.europa.eu. The platform is based on the system CISCO Meeting Server that is hosted in Portugal by NOS Comunicações SA under the EMCDDA framework contract FC.15.ICT.0005.1.0 that has been amended to provide the necessary obligations required for NOS to be able to act in accordance to the privacy regulation, as Processor under the instructions of the designated Controller.

The purpose of the processing is exclusively to perform the system administration tasks required for the proper functioning of the service and system.

The EMCDDA keeps full technical control to the access networks to the system, residing in NOS data centre and connected by a private, dedicated fibre-based network. Also, the access to that cabinet is only granted upon EMCDDA approval. There is no direct internet access through NOS networks, to access the system. All traffic, including for administrators, going through the EMCDDA firewalls and internet connection.

Two NOS named administrators, and the EMCDDA ICT Operations team, manage the system. The external administrators do not have a permanent connection to the system and need to request the ICT Service Desk for access in order to perform any maintenance or support actions.

The system does not include a recording functionality and the logs containing information on the meeting participants regularly erased.

### **Who has access to your information and to whom is it disclosed?**

Two NOS named administrators, and the EMCDDA ICT/SST team, manage the system. The external administrators do not have a permanent connection to the system and need to request the ICT Service Desk for access in order to perform any maintenance or support actions.

The system does not include a recording functionality and the logs containing information on the meeting participants regularly erased.

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<sup>1</sup> Article 3(8) of Regulation (EU) 2018/1725 defines the controller as follows: '[...] controller means the Union institution or body or the directorate-general or any other organisational entity which, alone or jointly with others determines the purpose and means of the processing of personal data [...]']



No data transfers are in scope or required for the proper functioning of this service and system.

### **Transfer of data to third parties**

The transfer of your data, either within or between Community institutions or bodies or to recipients, other than Community institutions and bodies, subject to Directive 95/46/EC, is safeguarded by Articles 4 to 13 of [Regulation \(EU\) 2018/1725](#). The third parties are called their attention to the respect of the principle that data must be processed in strict confidentiality and exclusively for the purpose for which it was submitted.

No data transfers to third parties are in scope or required for the proper functioning of this service and system.

### **How do we protect and safeguard your information?**

Both the EMCDDA and NOS Comunicações SA take appropriate and reasonable technical and organizational measures designed to protect Personal Information from loss, misuse, unauthorised access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Information.

As specified in the Data Processing clauses included in the contract:

«The service must be hosted at a NOS data centre in Portugal. In case NOS intends to change, after the contract entering in force, the location of the hosted service, the EMCDDA must be informed and may stop unilaterally the present contract.

NOS must ensure all diligence to keep the security, namely the confidentiality, of the EMCDDA data in transit and at store following the best practices of information security. This includes all operations performed by the system administrators. In case NOS uses sub-contractors to provision the required operations, EMCDDA must be informed and is entitled to require that non-disclosure agreements are signed by each system administrator»

### **How can you verify, modify or delete your information?**

[Regulation \(EU\) 2018/1725](#) safeguards your right to access your data. It also foresees the right to require the Controller to rectify without delay any inaccurate or incomplete personal data. You also have the right to require the Controller to erase data if the processing is unlawful. For changing contact details or erasing all other data, you need to contact the EMCDDA's the Information and communication technology Unit in writing using the following address: [ICT-HOU@emcdda.europa.eu](mailto:ICT-HOU@emcdda.europa.eu) Furthermore, you are free to address the European Data Protection Supervisor or the EMCDDA Data protection Officer at any time.

The right to rectification can only apply to the factual data processed during the concerned case.

### **What personal information do we collect and for what purpose?**

The categories of personal data stored in the platform and accessible system administrators are:

- First name;
- Last name;



- Email address;

Accessible by system administrators:

- IP addresses of the users (for security reasons);
- timestamp of any actions done by the user

Besides that the user related video and audio streams related to the service provision only exist for the span of the virtual meeting as the service and platform does not include a video/audio recording capability.

### **Legal basis for the processing of data**

The legal basis used by the EMCDDA to use Trusted Meetings service and platform is Regulation (EC) No 1920/2006 on the European Monitoring Centre for Drugs and Drug Addiction and the Information Systems Security Policy (ISSP) DEC/DIR/2019/009 in conformity with Regulation (EU) 2018/1725.

### **How long do we keep your data?**

The data collected is fundamental for the analysis of malfunctions and to improve the performance of the system. Log files are erased regularly and never kept more than six months.

### **Recourse**

You have the right to recourse via the European Data Protection Supervisor (EDPS@edps.europa.eu) if you consider that your rights under [Regulation \(EU\) 2018/1725](#) have been infringed as a result of the processing of your personal data by the EMCDDA. You may also contact the EMCDDA's DPO in case of any difficulties or for any questions relating to the processing of your personal data at the following e-mail address: DPO@emcdda.europa.eu.