

Data Protection Notice on Controlled Substances Squared (CS²) software

Last updated: 25/11/2025

1. Introduction / Why do we process your personal data?

This data protection notice explains how the European Union Drugs Agency (EUDA) process your personal data for the purposes of using the software system – Controlled Substances Squared (SC²) managed by Scitegrity Limited – which allows the Agency to verify control status of chemical substances across various jurisdictions, through creating and maintaining user accounts. Namely, it explains the way the EUDA collects, handles and ensures protection of all personal data provided, how that information is used and what rights you may exercise in relation to your data and how can you exercise them.

2. Who is responsible for the processing of your personal data (the controller) and under which legal grounds is it processed?

The European Union Drugs Agency (EUDA), Praça Europa 1, 1249-289 Lisboa, Portugal, is the controller of your personal data for the purposes described above. For more information on the EUDA: https://www.euda.europa.eu/index_en The data controller¹ is Pedro Assares, Head of Policy, Markets and Crime Unit, EUDA: Pedro.Assares@euda.europa.eu.

The legal basis of the processing is the Regulation (EU) 2023/1322 of the European Parliament and of the Council, of 27 June 2023 on the European Union Drugs Agency (EUDA) and repealing Regulation (EC) N° 1920/2006.

Any data collected or information provided in the framework described under point 1 above will be processed in accordance with 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.

3. What personal data do we collect and further process?

The following personal data are processed:

- a) identification details: Name, Login, Password;
- b) contact details: e-mail address.

4. Who has access to your personal data and to whom is it disclosed?

Your personal data is accessed only by authorized staff members within the EUDA who need the information to carry out their professional duties, such as those in the software administration and IT support. Where necessary, your personal data may also be disclosed to external auditors or consultants engaged by the EUDA for quality assurance or compliance purpose. In addition, a limited number of authorised staff within the data processor will also have access to your personal data for the sole purpose of allowing login and usage of the application.

5. Are your personal data subject to any international transfers?

Scitegrity Limited is a company based in the United Kingdom. Based on the contract agreement, the company only uses EU-based servers to provide services to the EUDA.

6. For how long do we keep your personal data?

Data of the CS² users are stored for as long as the users are registered and remain active, and/or as long as the EUDA is bound by contractual agreement with Scitegrity Limited. The current contract is envisioned for 3 years.

¹ Article 3 (8) of Regulation (EU) 2018/1725 defines controller as: 'the Union institution or body or the directorate-general or any other organisational entity which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by a specific Union act, the controller or the specific criteria for its nomination can be provided for by Union law.'

7. How do we protect your personal data?

Any personal data we collect is kept in restricted access servers located within the territory of the European Union, available only to authorised staff through adequate IT security measures. In general, technical measures include appropriate actions to address online security, protect server hardware, software and the network from accidental or malicious manipulations and risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed.

8. What are your rights regarding your personal data?

a) How can you verify, modify or delete your personal data?

As the individual to whom the personal data relate, you can exercise the following rights, all recognised under Regulation (EU) 2018/1725 (point 2 above):

1. access to your personal data under its Article 17;
2. rectify your personal data under its Article 18;
3. erase your personal data under its Article 19;
4. restrict the processing concerning yourself under its Article 20; or
5. exercise the right to data portability under its Article 22.

In addition, you can object to the processing of your personal data under Article 23 for reasons relating to your particular situation. When you contact us to exercise this right, please explain these reasons. We will remove your personal data, unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms.

b) How can you withdraw consent and the consequences of doing this?

Consent can be withdrawn at any time by notifying the EUDA. Withdrawing consent does not affect the lawfulness of processing based on consent before the withdrawal.

9. How long do you have to wait to receive our reply to your data subject rights' request?

After receiving your request, we have one month to provide information on action taken on your request. We may extend this period by two further months, taking into account the complexity and number of the requests. In those cases, we will inform you of the extension and its reasons within one month of receipt of your request.

10. Who can you contact to ask questions or exercise your rights?

In case of any difficulties or questions relating to the processing of your personal data, you may contact the DPO of the EUDA, Gonçalo Felgueiras e Sousa, at the following address;
dpo@euda.europa.eu

11. Who can you lodge a complain about the processing of your personal data

We encourage you to always contact us, as data controllers, first as described under point 10 above to raise your questions or concerns. In any case, if you believe that your rights under Regulation (EU) 2018/1725 have been infringed, you remain entitled to send a complaint to the EDPS, as a supervisory authority, using the following contact information:

European Data Protection Supervisor (EDPS)
Rue Wiertz 60 B-1047 Brussels,
Belgium