

**EUDA Personal Data Protection Record on
Controlled Substance Squared (CS²) compliance software**

Part 1 - mandatory records under Article 31 of the new rules (publicly available)

Nr.	Item	
Header – Versioning and reference numbers (recommendation: publicly available)		
1.	Last update of this record	25-11-2025
2.	Reference number:	DPO-058
Part 1 - Article 31 Record		
3.	Name and contact details of controller	Data controller: EUDA, Praça Europa 1, 1249-289 Lisboa, Portugal Contact: Pedro Assares, Head of Policy, Markets and Crime Unit, EUDA: Pedro.Assares@euda.europa.eu.
4.	Name and contact details of DPO	Gonçalo Felgueiras e Sousa, EUDA: dpo@euda.europa.eu
5.	Name and contact details of joint controller (where applicable)	n.a.
6.	Name and contact details of processor (where applicable)	Scitegrity Limited, Discovery Park, Ramsgate Road, Sandwich, Kent, CT13 9FF. Joe Bradley, CEO, joe.bradley@scitegrity.com
7.	Purpose of the processing	Allow usage of the Controlled Substances Squared (SC ²) software system/application which allows the Agency to verify control status of chemical substances across various jurisdictions.
8.	Description of categories of persons whose data EUDA processes and list of data categories	Categories of persons: EUDA staff registered on the platform. Data categories: a) identification details: Name, Login, Password; b) contact details: e-mail address.
9.	Time limit for keeping the data	As long as the users are registered and remain active, no longer than the duration of the contract (3 years).
10.	Recipients of the data	EUDA authorized staff members who need the information to carry out their professional duties, such as those in the software administration and IT support; External auditors or consultants engaged by the EUDA, for quality assurance or compliance purpose; as well as Limited number of authorised staff within the processor for the sole purpose of allowing usage of the application.
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	Scitegrity Limited, acting as the data processor, 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.

12.	General description of security measures, where possible.	The data processor is responsible for the encryption of the data at rest and in transit, and for ensuring that the system is regularly tested against data breaches. Only limited numbers of authorised personnel within the data processor will be able to access the information and for support purposes only. Data will be deleted if and when the contract is not renewed.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see point 8 of the data protection notice:	The Data Protection Notice is available as a PDF on the web page for Data Protection Record DPO-058 .