EMCDDA Personal Data Protection Record on
Providing qualified digital signatures and related signature servicesfor the EMCDDA using the provider Digitalsign.pt and their platform SigningDesk

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	08-12-2022
2.	Reference number:	DPO-050
Part 1 - Article 31 Record		
3.	Name and contact details of controller	Controller: EMCDDA Praça Europa 1, 1249-289 Lisboa, Portugal Contact: Pedro Duarte Ribeiro Head of ICT unit Pedro.Ribeiro@emcdda.europa.eu
4.	Name and contact details of DPO	Mr. Ignacio Vázquez Moliní, DPO, EMCDDA dpo@emcdda.europa.eu
5.	Name and contact details of joint controller (where applicable)	n.a.
6.	Name and contact details of processor (where applicable)	Digitalsign.pt https://www.digitalsign.pt/ds https://www.signingdesk.com/home
7.	Purpose of the processing	The EMCDDA wants to make use of qualified digital certificates for staff members to give them the possibility to sign electronically in their job function in an eIDAS compliant way, with at least EU-wide validity of these signatures for all purposes. The processing has as one part the identification of the staff member to provide the certificate, and as a second part the data necessary for each transaction/signature
8.	Description of categories of persons whose data EMCDDA processes and list of data categories	Categories of persons: EMCDDA staff members; Digitalsign Privacy policy: "*The personal data required by DigitalSign is the personal data indispensable for the provision of its services (in particular, issuing, billing and / or renewal of Digital Certificates and access to other services available). The collection can be done through the registration of the user in person, and by completing the form, through,the Digitalsign website, or by conducting a videoconference specifically directed to that purpose, if this option is applied and is chosen by the Client."* The categories of personal data stored in the platform and accessible the dedicated support from the Contractor

		side and the ICT team members providing the information: Type A • First name; • Last name; • Email address; • EMCDDA ICT unit (abbreviation) and Job title. During the onboarding process, to create legally valid certificates, other data may be required. These will only be shared between the individual user and the onboarding agent on the contractor side Type B • Passport number • Phone number for Two factor authentication • Visual identification by videocall (for human screening of the application)
9.	Time limit for keeping the data	*Digitalsign Privacy policy:* **For what purposes and for how long does DigitalSign treat your personal data?** Your personal data is processed by DigitalSign only for the period necessary to achieve the defined purpose or, depending on the applicable, until you exercise your right of opposition, right to erasure or withdraw consent. After the expiration of the storage period, DigitalSign will delete or anonymize the data when they are not to be stored for a different purpose and, in this sense, except for the fulfillment of the data preservation obligation imposed by Portuguese Legislation on Electronic Signatures, by the period of 7 years, according to the provisions of article 13, item f) of the Decree-Law n 12 / 2021, of February 9, all rights mentioned above are fully assured by DigitalSign. **What are the deadlines for processing and keeping personal data?** DigitalSign processes and stores your personal data according to specified, explicit and legitimate purposes. Nevertheless, and due to the fact that DigitalSign is a Trust Service Provider, accredited for the issuance of Digital Certificates, it is legally obliged to keep the data that have served as a basis for the provision of its services for a legal period of at least 7 (seven) years, pursuant to article 13, item f) of the Legal Regime of Electronic Documents and Digital Signature, corresponding to the updated version of Decree-Law n 12 / 2021, of February 9. Thus, and whenever there is no specific legal obligation, the data will be processed only for the period necessary to fulfill the purposes that led to its collection and preservation, and always in accordance with the law, CNPD guidelines (Portuguese Supervisory Body) and decisions, or competent authority under the law, as applicable. The personal data collected by DigitalSign will therefore be processed and retained for the purpose of performing the contract and during its execution period. After that period, the respective data will be kept for the

		legal period of 7 years, in accordance with the law. Otherwise, the processing and preservation of Customer's personal data may only occur through express consent, for the purpose related to the execution of the contract, or when justified by legitimate interests.
10.	Recipients of the data	Generic data (Type A) is accessible to the Project Team (a limited number of ICT users and Support from the Contractor side) Advanced information like passport number (type B) is accessed
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	From the Digitalsign Privacy Policy: ***Under what circumstances is your personal data communicated to other entities, subcontractors (processors) or third parties?*** *Your personal data may be transmitted to processors for them to handle according with DigitalSign instructions. In this case, DigitalSign will take the necessary contractual measures to ensure that subcontractors respect and protect the personal data of the data subject. Data may also be transmitted to third parties - entities other than DigitalSign or subcontractors, in particular companies with whom DigitalSign develops partnerships, if the holder has consented, or entities to whom the data must be communicated according with a legal obligation.* ***Does DigitalSign transfer your data to a third country?*** *DigitalSign doesn't transfer your personal data to a third country outside the European Union that isn't included in the list of countries that the European Union has already considered to meet adequate levels of protection of personal data.*
12.	General description of security measures, where possible.	From the Digitalsign Privacy Policy: ***How does DigitalSign protect your personal information?*** *DigitalSign has implemented the appropriate logical, physical and organizational security measures to protect your personal data from destruction, loss, alteration, dissemination, unauthorized access or any other form of accidental or illicit. DigitalSign has implemented:* *A) logical security requirements and measures such as the use of firewalls and intrusion detection systems in their systems, the existence of a rigorous access management policy to systems with personal data.* *DigitalSign has also implemented traceability mechanisms regarding the usage of our systems.* *B) Physical security measures, including a strict access*

		control to the physical premises of DigitalSign, by employees, partners and visitors, as well as a very limited and permanently monitored access to the essential technological infrastructures of DigitalSign; *C) Privacy by design using technological means such as mask, encryption, pseudonymization and anonymization of personal data, as well as a set of privacy-friendly preventive measures ("privacy bydefault ");* *D) Mechanisms of scrutiny, audit and control to ensure compliance with security and privacy policies;* *E) A training program of DigitalSign employees and partners; and* *F) Authentication mechanisms for customers or users of certain products or services, such as the introduction of a password, to strengthen control and securitymechanisms.*
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	See annex: ***1. Annex-service description*** ***2.*** Digitalsign ***privacy-policy-digitalsign.pdf*** • Online version of Digitalsign privacy policy https://www.digitalsign.pt/media/files/Downloads/privacy-policy-digitalsign.pdf • https://pki.digitalsign.pt/Agreement_en.pdf - General conditions **Digitalsign is a registered trusted service provider for qualified electronic**