

## Data Protection - DG ITEC Record of processing activity

### Description of personal data processing

**Purpose:** This file presents a detailed description of a personal data processing. **Such description has to be included in the Record file** in the context of the Accountability principle laid down in Article 4(2) of Regulation (EU) 2018/1725. Please refer to Article 31 of Regulation (EU) 2018/1725 presenting the requirements on Records of processing activities.

**By signing this document, the “Data Controller in practice” of the processing declares the accuracy of the statements and undertakes to update any change affecting this information.**

Nr.	Item	Description
<b>1. GENERAL INFORMATION</b>		
1.1	Record reference	<a href="#">DG-ITEC/C/1</a>
1.2	Record creation date	10/01/2019
1.3	Record last updated	11/10/2019
1.4	Record language	<input checked="" type="checkbox"/> English / <input type="checkbox"/> French
1.5	Name of the personal data processing (ideally referring to a <b>business process</b> )	<b>Multifunctional devices (MFDs) for printing, copying and scanning with authentication process</b>
1.6	Frame of reference of the personal data processing	<input type="checkbox"/> Business process basis ( <i>Set of related structured activities/tasks producing a specific service/product</i> ) <input type="checkbox"/> Programme basis ( <i>Set of related projects managed in a coordinated manner</i> ) <input type="checkbox"/> Project basis <input checked="" type="checkbox"/> Application basis
1.7	Short description of the context of the processing	<p>The multifunctional devices (MFDs) are installed to meet the objectives of the Parliamentary Project [ITEC P12] "Efficient printing" presented in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2017-2019, of the Parliamentary Project "Needs-based printing in the digital age" in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2019-2021 as well as the EMAS objectives (reduction of paper, toner and electricity consumption for IT equipment).</p> <p>The MFDs provides support for the employees/MEPs to execute basic and necessary tasks in the context of their work relationship/mandate.</p>
1.8	Name and contact details of the Data Controller  <b><u>Data Controller:</u></b> <i>Union institution or body or the directorate-general or any other organisational entity which determines the purposes and means of the processing of personal data.</i> <b>=&gt; MAKE DECISIONS ON THE PROCESSING</b> <b>=&gt; ACCOUNTABLE [Answerable for actions, decisions and performance]</b>	<a href="#">European Parliament</a> <b>Brussels (Belgium)</b> Postal address: Rue Wiertz 60, B-1047 - Brussels, Belgium Telephone: +32 2 284 20 05 Email: <a href="mailto:epbrussels@europarl.europa.eu">epbrussels@europarl.europa.eu</a>

Nr.	Item	Description
1.9	<p>Name and contact details of the Data “Controller in practice” (internal controller)</p> <p><b>Data “Controller in practice”:</b>  <i>Responsible of the processing on behalf of the data controller, which determines the purposes and means of the processing of personal data. This person should be the Business, Project or the Application Owner. This role should be held at least at the Unit level or at the Directorate or Directorate-General level depending on the scope of the processing operation.</i>            =&gt; MAKE DECISIONS ON THE PROCESSING            =&gt; RESPONSIBLE [Obligation to act and take decisions to achieve required outcome]</p>	<p>Name: [REDACTED]            Organisational entity: DG ITEC/EDIT/PRINTING            Position: Head of Unit - PRINTING Unit (under Directorate for Publishing &amp; Distribution)            Email: [REDACTED]</p>
1.10	Name and contact details of the Data Protection Officer	<p><b>European Parliament Data Protection Officer</b>            Postal address: KAD 06A001, 2 rue Alcide De Gasperi, L-2929 - Luxembourg, Luxembourg            Telephone: +32 2 284 20 05            Email: <a href="mailto:data-protection@europarl.europa.eu">data-protection@europarl.europa.eu</a></p>
1.11	<p>Name and contact details of joint controller (where applicable)</p> <p><b>Joint Controller(s):</b>  <i>Where two or more data controllers jointly determine the purposes and means of processing, they shall be joint controllers. They determine in a transparent manner their respective responsibilities for compliance with their data protection obligations by means of an arrangement between them (unless determined by Union or Member State law).</i>            =&gt; MAKE DECISIONS ON THE PROCESSING            =&gt; SHARED ACCOUNTABILITY [Answerable for actions, decisions and performance]</p>	N/A
1.12	<p>Name and contact details of processor (where applicable)</p> <p><b>Processor:</b>  <i>Natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.</i>            =&gt; FOLLOW DECISIONS AND INSTRUCTIONS OF THE DATA CONTROLLER IN WRITING</p>	<p>N/A            Machines are leased, so every intervention (Upgrade and maintenance of the solution) on the machines have to be made by the provider (Canon). External persons do not have access to personal data present in production (only to anonymised data).</p>
1.13	Functional mailbox for enquiries on processing of personal data (to be preferably used)	<a href="mailto:efficient_printing@ep.europa.eu">efficient_printing@ep.europa.eu</a>

Nr.	Item	Description
<b>2. PURPOSE AND LEGAL BASIS OF PROCESSING</b>		
<i>Personal data must be processed only for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes.</i>		
2.1	<p>Purpose of this processing of personal data</p> <p><i>Why personal data are used?</i></p> <p><i>What are the global features?</i></p> <p><i>What are the opportunities or the outcome of their use?</i></p>	<p>The multifunctional devices (MFDs) use personal data to provide more efficiency (for the printing / scanning / copying usage). They give the possibility to send jobs for printing (files to print) from PCs or mobile devices. The MFDs use also personal data to provide more security (e.g. higher level of protection for the printed documents) as well as to raise awareness on the paper and ink consumptions, in order to reduce the environmental impacts.</p> <p><b>About the user interface:</b>  These devices require user authentication to avoid physical interception of documents:</p> <ul style="list-style-type: none"> <li>– For the first time: necessity to register the EP badge (ID and password from the EP LDAP required),</li> <li>– For the next times: necessity to scan the EP badge.</li> </ul> <p>After scanning their EP badge on the MFDs, the data subjects (users) have access to different parameters where they can choose to modify, print or delete files (previously sent to the printer) or to scan or copy files.</p> <p><b>About the necessary use of personal data:</b>  Content of documents of printing/scanning/copying jobs is processed only in order to print/scan/copy the documents themselves. The content of documents of scanning and copying jobs is not stored. The content of the documents of printing jobs (documents printed or to be printed) is stored no longer than 96 hours (which is the time where the data subject can launch or relaunch the print of his/her documents).</p> <p>Log-in data and activity logs (also personal data) are processed only to enable each user to be authenticated for the printing of their documents, for support/debugging purposes and for statistical purposes (i.e. global and individual statistics). The global statistics refer to the reports aggregated per machine assigned to an entity (e.g. Unit, Directorate). The individual statistics refer to the personal consumption reports made available for consultation purposes only to the concerned user (raise awareness individually on environmental impact).</p> <p><b>About security:</b>  The MFDs improve:</p> <ul style="list-style-type: none"> <li>– The protection for confidential documents (i.e. the printing of documents only happens after the user authenticates at the machine, to avoid exposing them on a machine).</li> <li>– The security of the IT systems, because the solution restricts unauthorised access to the MFDs. The print/scan/copy services are made available only to the authorised personnel based on authentication.</li> </ul> <p><b>About the global and individual statistics (only on the consumption, not on the content):</b></p> <ul style="list-style-type: none"> <li>– The MFDs aggregates printing consumption information and produce global statistics (aggregated per machine assigned to an entity) that will be used to determine the appropriate allocation of printing resources according to the business needs across the buildings. Therefore, such data will</li> </ul>

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		<p>be used for reporting to enforce a corporate printing strategy, for instance to reduce the number of colour and simplex printed pages.</p> <ul style="list-style-type: none"> <li>– The MFDs will produce as well individual and personal printing statistics [NB: future feature] that will be made available for consultation to each individual user. This is an EMAS objective (the users must receive access to personal printing statistics in order to raise their awareness about the ecological impact of their printing activities). The goal is to encourage each user (data subject) to reduce his/her impact on the environment. Such data will be reported (for consultation purposes) only to the concerned user (data subject) via a specific web portal accessible upon authentication.</li> </ul> <p><b>About the reporting:</b></p> <p>The following aggregated reports will be automatically generated on demand and presented to the managers of Efficient Printing to evaluate the performance of the strategy:</p> <ul style="list-style-type: none"> <li>– Consumption reporting per entity (Service, Unit and Directorate)</li> <li>– Consumption: black&amp;white vs colour (per entity)</li> <li>– Consumption: simplex vs duplex (per entity)</li> <li>– Consumption reports per individual machine</li> <li>– Consumption reports per machine category (model)</li> <li>– Ecological reports</li> </ul> <p>The reports will be analysed and recommendations will be proposed in view of print fleet optimisation (i.e. ensure that each machine is being properly used according to its specifications and that each department receives the appropriate devices according to its printing needs).</p> <p>To summarise, the reports will be used for the following purposes:</p> <ul style="list-style-type: none"> <li>– Optimisation of the print fleet allocation</li> <li>– Costs efficiency</li> <li>– Quality of service improvement</li> <li>– Efficiency and effectiveness of the print service</li> <li>– EMAS objectives achievement (providing each user with an individual consumption report to which only the user has access – based on authentication)</li> </ul>
2.2	Internal decision or initiative for this processing operation	<p>These ePrinters are installed to meet the objectives:</p> <ul style="list-style-type: none"> <li>- of the Parliamentary Project [ITEC P12] "Efficient printing" presented in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2017-2019.</li> <li>- of the Parliamentary Project "Needs-based printing in the digital age" in the Parliamentary Project Portfolio (PPP) implementing the SEF (Strategic Execution Framework) 2019-2021.</li> <li>- of the EMAS objectives (reduction of paper, toner and electricity consumption for IT equipment).</li> </ul>
2.3	(If applicable) Purpose(s) for further processing and safeguards in place	<b>N/A (Support/Debugging, Statistics and reporting are included in the scope of the processing itself)</b>

Nr.	Item	Description
2.4	Lawfulness (to be checked with the <b>Data Protection Coordinator</b> )	<input checked="" type="checkbox"/> Article 5 (1.a) - Task carried out in the public interest or in the exercise of official authority vested in the Union institution or body ( <i>Remark: It shall be laid down in Union Law</i> ), or for the functioning of the EUIs, as per the interpretation of the EDPS <sup>1</sup> <input type="checkbox"/> Article 5 (1.b) - Legal obligation to which the Data Controller is subject ( <i>Remark: It shall be laid down in Union Law</i> ) <input type="checkbox"/> Article 5 (1.c) - Performance of contract (specific choice of data subjects) <input type="checkbox"/> Article 5 (1.d) - Data subjects' consent - freely given, specific, informed and unambiguous (clear affirmative action from data subject) <input type="checkbox"/> Article 5 (1.e) - Protect the vital interest of data subjects or other individuals
2.5	(if applicable) Data protection clause(s) (presenting the scope of the processor's mandate on processing personal data on behalf of the data controller)	N/A
<b>3. CATEGORIES OF DATA</b> Personal data means any information on an identified or identifiable natural person. Tick the relevant boxes to indicate the categories of data processed.		
3.1	List of personal data processed <sup>2</sup> per category	<p><b><u>Civil status data and identification</u></b></p> <div> <input checked="" type="checkbox"/> First name and last name           <input type="checkbox"/> Gender           <input type="checkbox"/> Citizenship(s)         </div> <div> <input type="checkbox"/> Identification card number           <input type="checkbox"/> Photography           <input type="checkbox"/> Date of birth         </div> <div> <input type="checkbox"/> Place of birth         </div> <div> <input type="checkbox"/> Other, please specify:            Click to enter text         </div> <hr/> <p><b><u>Data related to the professional sphere</u></b></p> <div> <input type="checkbox"/> Office number           <input type="checkbox"/> Phone number           <input checked="" type="checkbox"/> Email address         </div> <div> <input checked="" type="checkbox"/> Organisational entity (Directorate, Unit, Service)           <input type="checkbox"/> Employee number           <input type="checkbox"/> Job title (especially if it is unique)         </div> <div> <input type="checkbox"/> Data about recruitment           <input type="checkbox"/> Training           <input type="checkbox"/> Skills         </div> <div> <input type="checkbox"/> Degree and certification           <input type="checkbox"/> Employee's work           <input type="checkbox"/> Communication         </div> <div> <input type="checkbox"/> Employment contract and salary           <input type="checkbox"/> Leave and absence           <input type="checkbox"/> Missions         </div> <div> <input type="checkbox"/> Career           <input type="checkbox"/> Ability and efficiency           <input type="checkbox"/> Conduct         </div> <div> <input type="checkbox"/> Other, please specify:            Click to enter text         </div>

<sup>1</sup> According to the EDPS guidelines ([Accountability on the ground, v. 1.2 - December 2018](#)): "not all processing operations required for the functioning of the EUIs are explicitly mandated by legislation; recital [22] explains that they are nonetheless covered here, e.g. internal staff directory, access control".

<sup>2</sup> 'processing of personal data': any operation performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Nr.	Item	Description
		<p>-----</p> <p><b>Data related to the private sphere</b></p> <div> <input type="checkbox"/> Home address <input type="checkbox"/> Phone number <input type="checkbox"/> Email address </div> <div> <input type="checkbox"/> Bank account <input type="checkbox"/> Credit card number <input type="checkbox"/> Habits of life </div> <div> <input type="checkbox"/> Family situation <input type="checkbox"/> Social security and pensions <input type="checkbox"/> Income </div> <div> <input type="checkbox"/> Financial situation <input type="checkbox"/> Fiscal situation </div> <div> <input type="checkbox"/> Other, please specify:  Click to enter text </div> <p>-----</p> <p><b>Technical data</b></p> <div> <input checked="" type="checkbox"/> Username <input type="checkbox"/> Identifier <input type="checkbox"/> Location data </div> <div> <input type="checkbox"/> Internet Protocol (IP) address <input type="checkbox"/> MAC address <input type="checkbox"/> Cookie ID </div> <div> <input checked="" type="checkbox"/> Other, please specify:  Badge number, Windows user ID, password, username, technical job name (print, copy, scan job), date of the job and personal data included in the printing, copying and scanning data </div> <p>-----</p> <p><input checked="" type="checkbox"/> <b>Other category(ies) of specific data (list the personal data)</b></p> <p><i>(E.g. Data on physical characters)</i></p> <p>Please specify:</p> <p>For the global statistics (per machine assigned per entity) and individual statistics (per users available for consultation purposes only to the concerned user) on consumption: Records generated during the printing processing operations: the number and type of printed pages, the colorimetric mode (color; black and white) and the printing date. The content of the printing processing operations is/will not be recorded.</p>
3.2	Special categories of personal data	<input type="checkbox"/> Revealing racial or ethnic origin <input type="checkbox"/> Revealing political opinions <input type="checkbox"/> Revealing religious or philosophical beliefs <input type="checkbox"/> Revealing trade union membership <input type="checkbox"/> Processing of genetic data <input type="checkbox"/> Processing of biometric data for the purpose of uniquely identifying a natural person <input type="checkbox"/> Processing of data concerning health <input type="checkbox"/> Processing of data concerning a natural person's sex life or sexual orientation

Nr.	Item	Description
<b>4. DATA PROCESSING</b>		
<i>Data processing means any operation carried out on personal data, whether or not by automated means.</i>		
<b>4.1</b>	Collection of data	<p><input checked="" type="checkbox"/> <b>[Directly]</b> Collection from the data subject - please specify: During the authentication process, the user gives his/her credentials and badge number (first authentication) then only his/her badge number (next authentications). The badge number is given by just scanning the badge on the dedicated zone of the device. Then the data subject has the possibility to insert, modify and delete a file or a configuration.</p> <p><input checked="" type="checkbox"/> <b>[Indirectly]</b> Other source of collection - please specify: Personal data retrieved from the Active directory (Windows directory services, i.e. Windows user ID, first name, last name, email). All information is imported via several LDAP connectors to the Active directory.</p>
<b>4.2</b>	Mode of processing	<p><input type="checkbox"/> <b>[Fully automated]</b> Processing fully automated, without any human intervention</p> <p><input type="checkbox"/> <b>[Highly automated]</b> Processing automated, with human intervention only for maintenance and support</p> <p><input checked="" type="checkbox"/> <b>[Mainly automated]</b> Processing automated, with human intervention only for supervision and monitoring as well as maintenance and support</p> <p><input type="checkbox"/> <b>[Partly automated]</b> Processing in part automated, managed/conducted by human intervention</p> <p><input type="checkbox"/> <b>[No automated]</b> Manual processing of a structured set of data accessible according to given criteria</p>
<b>4.3</b>	Time limit for keeping the personal data (with the starting date and its justification)	<p><b>Per category of personal data or functionality</b> <b><u>On the current archives:</u></b></p> <p>- <b>For the authentication process</b>, login personal data (i.e. Windows user ID, first name, last name, email) are synchronized (i.e. continuously collected and so updated) with the Windows directory services (corporate directory).</p> <p>- <b>For the printing</b>, personal data (related to the content of the documents printed or to be printed) are kept up to 96 hours since the creation of the printing jobs (when the files are sent to print). During this period, the data subjects have the following possibilities:</p> <ul style="list-style-type: none"> <li>• To delete the files to print (in this case personal data are automatically deleted).</li> <li>• To print the files (in this case personal data are moved in the "Printed Jobs" tab with possibility to reprint the files, which are deleted at the end of the 96 hours).</li> <li>• To print and delete the files via the feature "Print + Delete" available in the "Options" window (in this case personal data are automatically deleted).</li> </ul> <p>- <b>For the copying</b>, personal data (related to the content of the documents) are kept on the multifunctional devices (MFDs) during the time of the copying process.</p> <p>- <b>For the scanning</b>, personal data (related to the content of the documents) are kept on the multifunctional devices (MFDs) during the time of the scanning process. Personal data are then transferred to the scan destinations chosen by the data subjects. The retention period for these transferred personal data are the ones established for each system of destination.</p>

Nr.	Item	Description
		<p><b><u>On the intermediate archives:</u></b></p> <p>- <b>For the activity logs used to produce global and individual statistics on printing processing operations,</b> records in databases are generated during the printing operations. These records include personal data on paper and ink consumption (not on the content of the documents that are deleted in any case after 96 hours) that are: the number and type of printed pages, the colorimetric mode (color; black and white) and the printing date.</p> <p>These data are only about the consumption itself. They are used for the global statistics (per machine assigned per entity) and they will be used for individual statistics (per users available for consultation purposes only to the concerned user) on consumption.</p> <p>The individual statistics on consumption are in development. The users (data subjects) will be informed prior to the activation of this new feature to start the individual statistics. The individual statistics will be presented to the users (provision of a user dashboard and/or user notifications) to raise awareness (self-awareness) on their own impact on the environment.</p> <p>These records will be retained for a maximum of 18 months from the moment they are collected to raise awareness based on statistics covering a sufficient period to present at least two situations of the same context and be able to compare these situations. For instance, it is not useful to compare May 2019 and May 2020, but it is useful to compare semester per semester or summer period per summer period. To do so, it is necessary to have more than 1 year since the context (e.g. session weeks or financial procedures) may not occur on the same dates, but some weeks later.</p> <p>- <b>For the activity logs used for support/debugging purposes,</b> there are different levels of logging available. In normal conditions, neither user information nor job information is recorded. However, at maximum level of logging (to debug an issue), the user identifier, the user name, the technical job identifier and the technical job name can be recorded depending on the nature of the issue. All type of logs are kept for 30 days, except in case of an error where data are deleted after the issue is resolved or after 1 year if it comes first.</p> <p><b>In case of an investigation (duly justified),</b> the same retention period rules will apply. Personal data will be transferred directly to the competent authority managing its own processing operation and its own retention period rules.</p>
4.4	Date or period of the beginning of the processing	Autumn 2018 (individual statistics foreseen in the beginning of 2020)
4.5	Date or period of the ending of the processing	Not foreseen
4.6	File location	<p><input type="checkbox"/> Standalone device: Please specify</p> <p><input checked="" type="checkbox"/> Parliament network: <a href="#">Data centers of the European Parliament</a></p> <p><input type="checkbox"/> Interinstitutional network: Please specify (indicate the institution(s) involved)</p> <p><input type="checkbox"/> Internet: Please specify (e.g. give the URL address)</p> <p><input type="checkbox"/> Other: Please specify</p>



Nr.	Item	Description
<b>5. RECIPIENTS &amp; DATA TRANSFER</b>		
<b>5.1</b>	Recipients or categories of recipients to whom data are or will be disclosed <b>Recipients:</b> <i>Physical or legal persons, administration, companies, staff under the controller or another service within EP, etc.</i>	Personal data are stored exclusively with restricted access on internal European Parliament servers. These personal data are accessible to the application owner (ITEC - PRINTING Unit). A limited number of back-office staff members (ITEC - OPERATIONS Unit) may receive (if necessary, i.e. for support/debugging purposes) log files.
/	<i>If the Data Controller (in practice) envisages transferring (or has already transferred*) personal data, please answer the questions in this section. * The Regulation (EU) 2018/1725 came into force on the 11th of December 2018. This record presents the characteristics of processing operations processed since the coming into force of this Regulation (since the 11/12/2018). The previous period is not considered here.</i>	
<b>5.2</b>	Are there transfers foreseen (or already made)?	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
-- 5.2.1	If yes, what types of transfers are they (or will that be)?	<input checked="" type="checkbox"/> Within the European Parliament: <a href="#">[Deliberate transfer if necessary, i.e. for support/debugging purposes]</a> log files referring only to job IDs (not to the data subjects) are sent to a limited number of back-office staff members (ITEC - OPERATIONS Unit) for support/debugging purposes.  <input type="checkbox"/> Within or between EU institutions, bodies, offices and agencies: <a href="#">Click to enter text</a>  <input type="checkbox"/> To recipients other than the EU institutions and bodies (e.g. national administrations, private sector), please specify: <a href="#">Click to enter text</a>  <input type="checkbox"/> To recipients outside the EU (e.g. third countries or international organisations) - please specify the adequate level(s) of protection <sup>3</sup> , the nature of the data that [may be/were] transmitted and their recipient: <a href="#">Click to enter text</a>  <input type="checkbox"/> Other, please specify: <a href="#">Click to enter text</a>
-- 5.2.2	If yes, [will/have] the data [be/been] transferred following a request from the recipient?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No (request from the application owner requesting to solve a problem/an incident : support/debugging purposes)
-- 5.2.3	If yes, [will/have] the data [be/been] transferred following a request from the data subject?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No (request from the application owner requesting to solve a problem/an incident : support/debugging purposes)

<sup>3</sup> The 'adequate level(s) of protection' may be:

- An adequacy decision by the EC
- An international agreement
- Appropriate safeguards (e.g. standard data protection clauses adopted by the EC or the EDPS; contractual clauses or provisions authorised by EDPS)
- Derogations for specific situations (e.g. protect vital interests; important reasons of public interest; establishment, exercise or defence of legal claims)

Nr.	Item	Description
-- 5.2.4	If yes, [will/Has] the recipient [be/been] informed of his obligations in respect of this transfer?	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
-- 5.2.5	If yes, will the transfer be carried out by a contractor <sup>4</sup> (or is it carried out by a contractor)?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No
<b>6. SECURITY</b>		
<i>The Data Controller (in practice) must implement the appropriate technical and organisational measures to ensure an appropriate security level with a view to the prevention of any unauthorised distribution or access, any accidental or illicit destruction, any accidental loss or deterioration, as well as any other form of illicit processing. Give a general description allowing a preliminary evaluation of the adequacy of the measures taken to ensure the security of processing</i>		
6.1	Physical security (Access to computer systems, quality of the file supports, public access or restricted access to locations, storage, transport of equipment, etc.)	<p>The new devices require user a physical authentication</p> <p>When data subject (user) send files to print (job for printing) from a device (PC or mobile device), he/she can only collect his/her files after authentication.</p> <p>Authentication process:</p> <ul style="list-style-type: none"> <li>- First authentication: the user gives his/her credentials and badge number (by scanning it).</li> <li>- Next authentications: the user gives only his/her badge number (by scanning it).</li> </ul> <p>Further detail on the authentication process (in case the badge is lost/stolen):</p> <p>If there is a the loss or the theft of a badge, the data subject can inform the HelpDesk that will notify directly DG SAFE, which will deactivated or blocked the badge without delay. The MFDs system are not be able to accept a deactivated or blocked badge (no delay). Once DG SAFE is notified, DG SAFE launches immediately the process to create a new one. His/her badge will be linked directly to his/her new account. He/she will need to restart the authentication process (first authentication).</p> <p>Servers storing personal data have a strictly limited physical access.</p> <p>HDD Erase function: The HDD Data Erase will automatically overwrite and erase image data immediately after the job is completed; therefore, no trace of the data remains on the hard disk. It will perform an overwrite up to 3 times (DoD 5220.22M 3 pass) with random data for maximum security protection.</p>
6.2	IT system(s) security (Coding control, undue removal or transmission of data, passwords, encrypted directories, backup, audit trails for data processing and communication, etc.)	<p>The HDD Data Encryption uses AES256-bit length encryption keys. This ensures that the data stored on the hard disk is protected against leakage of confidential information by theft of the hard disk.</p> <p>Data are encrypted for the printing, scanning and copying. The end-to-end encryption will depend on all terminals used:</p> <ul style="list-style-type: none"> <li>• The MFDs are all encrypted.</li> <li>• The EP servers used in the solution are all encrypted. Print server Spool file encryption protect files spooled to await on servers.</li> </ul>

<sup>4</sup> Contractor: considered as a processor when processing personal data on behalf of the data controller

Nr.	Item	Description				
		<ul style="list-style-type: none"><li>The terminal of the user (i.e. if the PC, mobile phone, tablet [sending the document to be printed or receiving the document scanning]).<ul style="list-style-type: none"><li>The corporate terminals are all encrypted (desktop, laptop, hybrid)</li><li>The personal devices cannot be connected to UniFlow</li></ul></li></ul> <p>Further details on the print jobs (stored up to 96 hours): The Canon solution (uniFLOW) also uses AES 256-bit encryption to protect print job data while in transmission over the network. To protect print jobs from being output at an unwanted device, the encrypted secured print feature holds the job in a queue until the user release the job using one of the agreed authentication method. For the authentication to the Parliament’s devices, users need to use badge to unlock the MF Device to access any function.</p>				
6.3	Staff security (Restricted access codes, conditions of subcontracting, etc.)	Concerning the accounting data in database: accounting and reporting information is only available for the "Admin" ACL (Access Control List) group.				
7. DATA SUBJECTS						
The persons to be protected are identified or identifiable natural persons whose personal data are processed by the European Parliament in any context whatsoever.						
7.1	Category (or categories) of data subjects and its (their) description(s)	<table><tr><td><p><b><u>Category(ies) of data subjects defined regarding the status of individuals working for/within the EU institutions (EUIs):</u></b></p><p><input checked="" type="checkbox"/> EP Officials / <input checked="" type="checkbox"/> Other EUIs Officials <input checked="" type="checkbox"/> EP Temporary agents / <input checked="" type="checkbox"/> Other EUIs Temporary agents <input checked="" type="checkbox"/> EP Contract agents / <input checked="" type="checkbox"/> Other EUIs Contract agents <input checked="" type="checkbox"/> EP Trainees / <input checked="" type="checkbox"/> Other EUIs Trainees <input type="checkbox"/> EP External agents / <input type="checkbox"/> Other EUIs External agents <input checked="" type="checkbox"/> MEPs <input checked="" type="checkbox"/> APAs (Accredited Parliamentary Assistant) <input checked="" type="checkbox"/> Others, please specify: cf. Description in the right column.</p></td><td><p><b><u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>5</sup>:</u></b></p><p>Please specify: Persons entitled to consume the European Parliament printing / scanning / copying services.</p></td></tr><tr><td><p><b><u>Category(ies) of data subjects defined regarding the external relationship with the EU institutions (EUIs):</u></b></p><p><input type="checkbox"/> European citizens <input type="checkbox"/> Visitor of the European Parliament / <input type="checkbox"/> Visitor of other EUIs <input checked="" type="checkbox"/> Others, please specify: Former MEPs, retired Officials</p></td><td><p><b><u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>6</sup>:</u></b></p><p>Please specify: Persons entitled to consume the European Parliament printing / scanning / copying services.</p></td></tr></table>	<p><b><u>Category(ies) of data subjects defined regarding the status of individuals working for/within the EU institutions (EUIs):</u></b></p> <p><input checked="" type="checkbox"/> EP Officials / <input checked="" type="checkbox"/> Other EUIs Officials <input checked="" type="checkbox"/> EP Temporary agents / <input checked="" type="checkbox"/> Other EUIs Temporary agents <input checked="" type="checkbox"/> EP Contract agents / <input checked="" type="checkbox"/> Other EUIs Contract agents <input checked="" type="checkbox"/> EP Trainees / <input checked="" type="checkbox"/> Other EUIs Trainees <input type="checkbox"/> EP External agents / <input type="checkbox"/> Other EUIs External agents <input checked="" type="checkbox"/> MEPs <input checked="" type="checkbox"/> APAs (Accredited Parliamentary Assistant) <input checked="" type="checkbox"/> Others, please specify: cf. Description in the right column.</p>	<p><b><u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>5</sup>:</u></b></p> <p>Please specify: Persons entitled to consume the European Parliament printing / scanning / copying services.</p>	<p><b><u>Category(ies) of data subjects defined regarding the external relationship with the EU institutions (EUIs):</u></b></p> <p><input type="checkbox"/> European citizens <input type="checkbox"/> Visitor of the European Parliament / <input type="checkbox"/> Visitor of other EUIs <input checked="" type="checkbox"/> Others, please specify: Former MEPs, retired Officials</p>	<p><b><u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>6</sup>:</u></b></p> <p>Please specify: Persons entitled to consume the European Parliament printing / scanning / copying services.</p>
<p><b><u>Category(ies) of data subjects defined regarding the status of individuals working for/within the EU institutions (EUIs):</u></b></p> <p><input checked="" type="checkbox"/> EP Officials / <input checked="" type="checkbox"/> Other EUIs Officials <input checked="" type="checkbox"/> EP Temporary agents / <input checked="" type="checkbox"/> Other EUIs Temporary agents <input checked="" type="checkbox"/> EP Contract agents / <input checked="" type="checkbox"/> Other EUIs Contract agents <input checked="" type="checkbox"/> EP Trainees / <input checked="" type="checkbox"/> Other EUIs Trainees <input type="checkbox"/> EP External agents / <input type="checkbox"/> Other EUIs External agents <input checked="" type="checkbox"/> MEPs <input checked="" type="checkbox"/> APAs (Accredited Parliamentary Assistant) <input checked="" type="checkbox"/> Others, please specify: cf. Description in the right column.</p>	<p><b><u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>5</sup>:</u></b></p> <p>Please specify: Persons entitled to consume the European Parliament printing / scanning / copying services.</p>					
<p><b><u>Category(ies) of data subjects defined regarding the external relationship with the EU institutions (EUIs):</u></b></p> <p><input type="checkbox"/> European citizens <input type="checkbox"/> Visitor of the European Parliament / <input type="checkbox"/> Visitor of other EUIs <input checked="" type="checkbox"/> Others, please specify: Former MEPs, retired Officials</p>	<p><b><u>Description of the category(ies) in relation to the processing with regard to its nature and context<sup>6</sup>:</u></b></p> <p>Please specify: Persons entitled to consume the European Parliament printing / scanning / copying services.</p>					

<sup>5</sup> For instance: [Persons](#) equipped with a physical token / [Persons](#) having access to the EP Intranet.

<sup>6</sup> *Ibid*

Nr.	Item	Description
7.2	Measures taken or envisaged to inform the data subject of the identity of the Data Controller (in practice), of the personal data processing on his/her data, and of his/her rights as a data subject.	<p>There are two communication tools to inform the data subject:</p> <ul style="list-style-type: none"> <li>- Data Protection Notice notifying the data subjects of the processing of personal data and inviting them to see the Data Protection Statement for further information on the processing.</li> <li>- Data Protection Statement informing data subjects of all mandatory elements mentioned in Article 15 and 16 of Regulation (EU) 2018/1725.</li> </ul> <p>Additional features have been requested (to the solutions' provider - Canon) in order to be able to inform correctly the data subjects (information up-to-date).</p>
7.3	How data subjects may exercise their rights (such as rights of access, to rectification, to erasure, of blocking and to object)?	<p>By sending an email to <a href="mailto:efficient_printing@ep.europa.eu">efficient_printing@ep.europa.eu</a>. Their requests will be analysed and processed.</p> <p>Additional features have been requested (to the solutions' provider - Canon) in order to be able to reply to data subjects' requests.</p>
7.4	Have any natural or legal persons employed by or under contract to the European Parliament received any instructions about confidentiality in processing personal data?	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
7.5	Is there any decision taken automatically (without any human intervention) that can have a negative impact on a specific individual?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No
<b>8. FURTHER INFORMATION</b>		
<i>Give any information you consider relevant and indicate the heading it refers to:</i>		
<p><b>Points 3.1 and 3.2:</b></p> <p>Different natures of personal data (present in the documents to be printed, copied and/or scanned) may be processed in the MFDs in order to print/scan/copy the documents themselves. However, the MFDs do not analyse the content of the documents, do not store the content of the documents scanned/copied and do not store longer than 96 hours the content of the documents printed or to be printed (time where the data subject can launch or relaunch the print job(s) of his/her documents).</p>		
<b>9. ACCOUNTABILITY</b>		
<i>Document references or links with Data Protection aspects proving the choices and measures taken</i>		
<i>=&gt; NECESSARY AND ESSENTIAL TO BE ABLE TO DEMONSTRATE COMPLIANCE</i>		
/	/	Type of document
9.1	Information document	<p><input checked="" type="checkbox"/> Data Protection Statement (<i>providing the individual with the detailed description of the processing, of his/her rights and how to exercise them</i>)</p>
		Reference, links and/or location
		<p>Data Protection Statement:</p> <ul style="list-style-type: none"> <li>- on the intranet: <a href="https://epintranet.in.ep.europa.eu/home/browse-as/it-support/it-security-data-protection/it-protection-personal-data.html">https://epintranet.in.ep.europa.eu/home/browse-as/it-support/it-security-data-protection/it-protection-personal-data.html</a></li> <li>- on the user manual</li> <li>- close to the machine</li> </ul>

Nr.	Item	Description	
		<input checked="" type="checkbox"/> Data Protection Notice(s) ( <i>notifying the individual whether or not personal data are processed</i> )	Data Protection Notice published: - on the poster - in the emails of communication - in the emails sending the scan job [current analysis of feasibility]
		<input type="checkbox"/> Protocol ( <i>sharing instructions about confidentiality in processing personal data</i> )	
		<input type="checkbox"/> Others, please specify: <a href="#">Click to enter text</a>	
9.2	Project and technical documents	<input type="checkbox"/> Project documents (e.g. annex on Data Protection within the Business Case)	
		<input type="checkbox"/> Technical specifications documents	
		<input type="checkbox"/> User manual documents	
		<input checked="" type="checkbox"/> Others, please specify: <a href="#">Canon documents where the EP requested further features/analysis on data protection</a>	- EP GDPR information handling - Security Strategy For Prod. environment at EP - Uniflow – scripts for support of GDPR_EP - Data flow diagrams
9.3	Security documents	<input type="checkbox"/> DPIA documents (where applicable)	
		<input type="checkbox"/> Technical security measures' documents	
		<input type="checkbox"/> Organisational security measures' documents	
		<input checked="" type="checkbox"/> Others, please specify: <a href="#">High risk pre-assessment</a>	High-risk pre-assessment performed by the EP.
9.4	Others, please specify:		

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The “Data Controller in practice” declares the accuracy of the above statements and undertakes to update any change affecting this information.

Date:

Signature of the “Data Controller in practice”: