

**From:** [REDACTED]  
**Sent:** 12 July 2019 15:56  
**To:** [REDACTED]  
**Cc:** [REDACTED] European Data Protection Supervisor; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373  
**Attachments:** MFD - Data flow glossary.xlsx; MFD - Data flow diagrams.pdf

Dear [REDACTED]

We are pleased to share with you data flow diagrams that we received from Canon.

These diagrams present data management per process: Logon process, End-user Print and Release, Mobile Print, Scanning process, Logoff process, Communication between each server and MFD.

Please also find attached a glossary on the technical terms used.

I hope these elements will provide you with sufficient information for the analysis.

Please, do not hesitate should you have any question or need further clarification.

Kind regards,



[REDACTED]  
European Parliament  
Directorate-General for Innovation and Technological Support  
[REDACTED]  
[www.europarl.europa.eu](http://www.europarl.europa.eu)

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**From:** [REDACTED]  
**Sent:** 08 July 2019 15:33  
**To:** [REDACTED]  
**Cc:** [REDACTED]; European Data Protection Supervisor; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373  
**Dear** [REDACTED]

In your previous correspondence you have said that 'The application owner is in contact with the solution provider (Canon) to obtain a complete diagram of the data flow of the ePrinting system'.

In our view, this information is very important to the analysis of this case file.

Therefore, in case you have received it, could you please provide us with that data flow diagram?

In case you have not yet received it, could you please inform us when are you expecting to receive that information?

Thank you in advance for your cooperation.

Kind regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 June 2019 19:03  
**To:** [REDACTED]  
**Cc:** [REDACTED] European Data Protection Supervisor <[EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)>; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373  
**Dear** [REDACTED]  
Thank you very much for your reply. We will analyse it and provide you with feedback asap.  
Kind regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 June 2019 18:37  
**To:** [REDACTED]  
**Cc:** [REDACTED]; European Data Protection Supervisor; [REDACTED]  
**Subject:** RE: Request for information | 2019-0373  
**Dear** [REDACTED]

Thank you for your attention to the analysis of the document presented. We are pleased to answer your questions with the following explanations per point raised.

**1. Anonymous data**  
The statistics carried out are based on standard requests where anonymous results have a minimum level of granularity per machine assigned to an organisational entity (e.g. a Directorate, a Unit, a Service). The data processed are the number and type of printed pages, the colorimetric mode (color, black and white) and the printing date. These are global statistics used to determine the most appropriate allocation of printing resources in terms of paper and printer cartridges. Please find attached some examples of these global statistics.

**2. Complete diagram of the data flow**  
The application owner is in contact with the solution provider (Canon) to obtain a complete diagram of the data flow of the ePrinting system.

**3. Data retention**  
We mentioned 18 months since we were aware of an existing script exchanged with the European Commission to reduce the data retention period. However, we need now to reconsider this retention period since we have recently received a request from the Directorate-General for Personnel (DG PERS) of the European Parliament to keep personal data for a longer period to be used in inquiries and disciplinary cases. In the context of Article 86 of the Staff Regulations (and their Annex IX) and the general implementing provisions governing disciplinary proceedings and administrative investigations, DG PERS would propose the retention period of the discharge plus two years, given that no retention period is foreseen in those legal basis.  
Your advice on this would be very useful.

**4. Data encryption**  
As it is presented in the description of the processing, the HDD Data Encryption (using AES256-bit encryption) protects data stored on the hard disk.  
At the software level, 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 from an unattended device, the encrypted secured printing feature holds the job in a queue until the user releases the job using one of the agreed authentication methods. I hope these clarifications are useful, do not hesitate should you have any question or need further clarification.  
Maria Castillejo



[REDACTED]  
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**From:** [REDACTED]  
**Sent:** 15 May 2019 17:29  
**To:** [REDACTED]  
**Cc:** [REDACTED] European Data Protection Supervisor  
<[EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)>  
**Subject:** Request for information | 2019-0373

Dear [REDACTED]

I hope this email finds you very well. I'm writing you regarding the informal consultation on the European Parliament's 'efficient printing' system (EDPS case file 2019-0373).

We thank you for the additional information you provided by email on 17/04/2019.

After the analysis of the documentation sent, we kindly ask you to clarify the following four points:

1. **Anonymous data**  
The personal data processing record states on page 3 that '[a]nonymised data will be used for statistical purposes in order to have a better overview of the paper and toner consumption'. Could you please provide additional details on what kind of anonymous data will you collect for statistical purposes and why you deem that such data should be considered anonymous. Is it, for example, 800 pages, toner consumption 50% on week 15?
2. **Complete diagram of the data flow**  
If available, could you please provide us with a complete diagram of the dataflow of the 'efficient printing' system.
3. **Data retention period**  
The personal data processing record states on page 5 that '[e]ncrypted records in databases (stored on the European Parliament servers) are generated during the processing operations. Personal data will be retained for a maximum of 18 months from the moment they are collected'. Could you please clarify the need for this data retention and what kind of personal data will be retained.
4. **Data encryption**  
You mention the type of encryption for the HDD data. Do you use the same encryption method (AES256-bit) for the other encrypted system?

We would appreciate if you could send us the information requested above by 11 June.

Thank you in advance for your collaboration.

Kind regards,



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[REDACTED]  
**European Data Protection Supervisor**  
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