

From: [REDACTED]
Sent: 17 April 2019 18:51
To: [REDACTED]
Cc: [REDACTED] European Data Protection Supervisor
Subject: RE: Consultation about the efficient printing' system | EDPS case n° 2019-0373
Attachments: Att 1 - 2019.03.29 - Description of the processing - MFDs with authentication process (002).pdf; Att 2 - 2019.04.01 - Description of the processing - MFDs with authentication process.pdf; Att 3 - 2019.04.04 - Notification - MFDs with authentication process.pdf; Att 4 - 2019.04.01 - PS - MFDs with authentication process.pdf; Att 5 - 2019.03.29 - PN - MFDs with authentication process.pdf

Dear [REDACTED],

First of all, we would like to thank you for giving us the opportunity to present the situation on this file during our last meeting.

As regards the informal consultation, please find attached the documents provided during the meeting:

- [Att 1] The description of the processing as part of the Record (first version dated 29/03/2019 with the identification of the data controller);
- [Att 2] The description of the processing as part of the Record (second version dated 01/04/2019 with the identification of the data controller and of the data "controller in practice");
- [Att 3] The notification of the processing used in the current internal procedures;
- [Att 4] The Privacy Statement (PS) that we would like to publish on the intranet;
- [Att 5] The Privacy Notices (PN) with a shorter version for the posters and a longer version for the intranet (such as on intranet pages related to the [Network Printers](#), to the [Efficient printing](#) as well as to the Printing and scanning for [MEPs](#) and [EP Staff](#)).

We have taken note of your remarks during the meeting on the publication of the Privacy Statement on different communication support (i.e. Privacy Statement in the user guide and on the posters, links to the Privacy statement in the emails received after scanning).

In this regard, we have some questions about the posters on the walls close to the printers. We had firstly the idea to include on the posters a Privacy Notice (a short version of the privacy statement, referring to the full Privacy Statement published in the intranet). This element was discussed during the meeting, but you suggested to display instead the whole Privacy Statement on the posters.

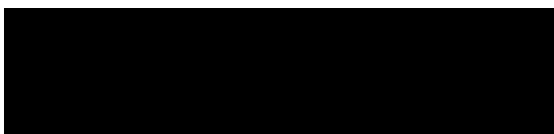
Unfortunately, the outlet of the posters does not allow to include the full text of the Privacy Statement (as presented in the file). At the end of the meeting, we discussed the possibility to present the Privacy Statement in separate posters also close to the printers. However, we wonder if publishing too much information in the same place (instructions on how to use the printers and Privacy Statement) will hinder communication.

Furthermore, having the Privacy Statement published in too many places may increase the risk of incoherence in case of update or modification, as timely managing updates for the physical supports is challenging in an Institution with three headquarters and several buildings in each of them.

Our intention is to provide the data subject with clear, complete and up-to-date information about the processing of his/her personal data. To this end, we would be grateful if you could provide recommendations on how to combine the need for easily accessible and direct information to the data subject and efficient updates on physical supports.

Many thanks in advance for your answer,

Yours sincerely,



European Parliament
Directorate-General for Innovation and Technological Support
Directorate for Resources

[REDACTED]

From: [REDACTED]
Sent: 16 April 2019 11:19
To: [REDACTED]
Cc: [REDACTED]
European Data Protection Supervisor <EDPS@edps.europa.eu>
Subject: Consultation about the efficient printing' system | EDPS case n° 2019-0373

Dear [REDACTED],

Following our meeting of 4 April 2019, on behalf of the EDPS I acknowledge receipt of your request for informal consultation on the European Parliament's efficient printing system.

At this regard, could I kindly ask you to send us the digital version of the documents that you have provided us during the meeting. Please do not hesitate in sending us any other documents that you find relevant for the analysis of this matter.

For further correspondence, please note that the case number for this matter is 2019-0373. Please include the EDPS functional mailbox (edps@edps.europa.eu) in all your communications with the case officer.

Yours sincerely,



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Office address: Rue Montoyer 30, B-1000 Brussels
[@EU EDPS](mailto:@EU_EDPS) www.edps.europa.eu

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