



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

15 July 2021
EMA/175429/2020

European Medicines Agency's Privacy statement for managed print services

The European Medicines Agency (hereinafter "EMA" or "Agency") is committed to respect the right to data protection of its staff members and the public. The Agency collects and uses personal data in accordance with Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

This Privacy Statement explains the most essential details of the processing of personal data by EMA in the context of the managed print services. This includes processing data in order for persons at EMA using the multifunctional devices to access and use these devices.

1. Who is the data controller?

The European Medicines Agency ("EMA") is ultimately responsible to comply with your data protection rights and freedoms. On behalf of EMA, the Head of the Administration and Corporate Management Division is appointed as a 'Data Controller' to ensure the lawful conduct of this processing operation.

The contact details of the Data Controller are the following:

DataController.Administration@ema.europa.eu

2. Purpose of this data processing

Processing of personal data is necessary for EMA users in order to operate multifunctional devices (MFDs) for printing, copying and scanning documents in the course of the operation of the Agency and performing Agency tasks.

The purpose of this data processing activity is to allow individual access (with an individual card or with a one-time only unique code) to MFD users at EMA to print, copy and/or scan documents. Meter reads of MFDs that do not contain personal data are also processed for invoicing purposes.

3. What personal data do we process and how?

3.1. Personal Data concerned

The following categories of personal data are collected for this processing operation:

- User data which includes the following:
 - Username (login name for the EMA operating system)
 - User logon name
 - Email address
 - Organisational unit/cost centre
- Print metadata which includes the following personal data:

Official address Domenico Scarlattilaan 6 • 1083 HS Amsterdam • The Netherlands

Address for visits and deliveries Refer to www.ema.europa.eu/how-to-find-us

Send us a question Go to www.ema.europa.eu/contact **Telephone** +31 (0)88 781 6000

An agency of the European Union



- Date of login
- Time of login
- Email address

The above information is collected in respect of Temporary Agents, Contract Agents well as Individuals on secondment with EMA, Interims, Trainees and Contractors.

Delegates at EMA do not use their access card and instead use a one-time only unique code to release a print job. In this case only the following print metadata and user data is collected for the processing operation:

- Date of print
- Time of print
- Email address (user data)

3.2. Legal Basis

The processing of personal data in the context of the EMA managed print and ancillary services is necessary for the management and functioning of the Agency in accordance with Recital 22 of Regulation (EU) 2018/1725 which states that:

"Processing of personal data for the performance of tasks carried out in the public interest by the Union institutions and bodies includes the processing of personal data necessary for the management and functioning of those institutions and bodies."

This personal data processing activity is therefore based on Article 5(1)(a) of Regulation (EU) 2018/1725 as it is necessary the performance of EMA's tasks in the public interest.

4. How long do we keep your data?

User data: up to a maximum of 72 hours as explained below.

In the case of a delegate, the personal data of the delegate using the print feature is retained on the MFD server only until the delegate uses the unique code to release the print job. The print server can read a functional MFDprint mailbox. As soon as a print job is processed, the system deletes the delegate's email from the mailbox. If for any reason, the delegate does not enter the unique one-time only code into any MFD to release the print then the maximum retention time of the delegate's email is 72 hours.

Scanned documents: scan data is volatile only and directly sent to the requested destination (internal electronic folder). Scan data is not kept or stored on the server.

Printed documents – print metadata is stored depending on the configuration of the server. The data is not stored on multifunctional devices (MFD). Standard configuration of the print software (i.e. storage of the metadata) is limited to up to 72 hours.

5. Who has access to your information and to whom is it disclosed?

The data may only be accessed by internal EMA system administrators.

The fleet of multifunctional devices (MFD) is provided and administered by the company Xerox (Nederland) B.V.

Xerox does not have system administrator rights. Any software installations and system configurations of the environment that have to be performed are done under EMA systems administrator's assistance and supervision without having access to the personal data processed in the system.

Invoices for the print service provided by Xerox are based on meter reads which do not contain personal data, just reference numbers of MFDs and number of copies printed over a period of time.

6. Data Security

The Agency has appropriate technical and organisational measures in place, including organisational policies, to safeguard the security of personal data and ensure the confidentiality, integrity and availability of the relevant systems, services and the personal data processed within them. In particular,

- user names and logon details are stored electronically on a secure network in an electronic records management system, and the request is logged in an internal database;
- passwords are required to access both systems;
- the title and content of any documents printed by the MFDs are encrypted and are not visible to Xerox
- when users have no logon details, security is ensured by use of a one time only unique secure code to release each print job.

7. Your data protection rights

As data subject (i.e. the individual whose personal data is processed), you have a number of rights:

- **Right to be informed** – This Privacy Statement provides information on how EMA collects and uses your personal data.
- **Right to access** – You have the right to access your personal data. You have the right to request and obtain a copy of the personal data processed by EMA.
- **Right to rectification** – You have the right to obtain - without undue delay - the rectification or completion of your personal data if it is incorrect or incomplete.
- **Right to erasure** - You have the right to require EMA to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing. In certain cases your data may be kept to the extent it is necessary, for example, to comply with a legal obligation of the Agency or if it is necessary for reasons of public interest in the area of public health.
- **Right to restrict processing** – In a few, codified cases, you have the right to obtain the restriction of the processing, meaning that your data will only be stored, but not actively processed for a limited period of time. For more information about this right and its limitations, see the EMA General Privacy Statement, hosted at www.ema.europa.eu/en/about-us/legal/privacy-statement.
- **Right to object** – If the Agency processes your data for the performance of a task in the public interest (without your consent or another lawful basis); you have the right to object to this processing on grounds related to your particular situation

The rights of the data subject can be exercised in accordance with the provisions of Regulation (EU) 2018/1725. For anything that is not specifically provided for in this privacy notice, please refer to the contents of the general EMA Privacy Statement: www.ema.europa.eu/en/about-us/legal/privacy-statement

8. Recourse

Should you have any questions regarding the processing of your personal data, or you think that the processing is unlawful or it is not in compliance with this Privacy Statement or the general EMA Privacy Statement, please contact the **Data Controller** at DataController.Administration@ema.europa.eu.

Data subjects may lodge a complaint with the **EMA Data Protection Officer**: dataprotection@ema.europa.eu.

You also have the right to lodge a complaint with the **European Data Protection Supervisor (EDPS)** at any time at the following address:

- Email: edps@edps.europa.eu
- Website: www.edps.europa.eu

- Further contact information: www.edps.europa.eu/about-edps/contact_en