

IT Service Management Ticketing System - JIRA

The European Union Agency for Fundamental Rights (FRA or Agency) processes the personal data of a natural person in compliance with Regulation 2018/1725 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

This data protection notice explains FRA's policies and practices regarding its collection and use of your personal data, and sets forth your privacy rights. We recognise that information privacy is an ongoing responsibility, and we will update this notice where necessary.

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1. Why do we process personal data?

The purpose of the processing relates to the provision of a cloud IT Service management ticketing system for the Agency (JIRA Service Management). It allows the Agency's staff to submit their tickets linked to IT and Facilities requests and to monitor their status as they are being addressed by the IT helpdesk.

The Agency is already using Atlassian JIRA service management module for its IT ticketing solution. This was implemented back in 2019 and it is hosted internally. However, as of February 2024 the on-premises version is not anymore supported by Atlassian, and all clients need to move to the cloud version (SaaS version). Therefore, it was decided to move to the cloud version of JIRA.

The use of a cloud solution is also in accordance with the Agency's Cloud strategy 2022-2025 indicating the use of cloud solutions.

2. What kind of personal data does the Agency process?

We will collect only the following personal data necessary for the processing operation described above.

(a) General personal data:

- Personal details: name, surname.
- Contact details: email address.
- Other:

Data processed by Atlassian:

In addition to the name and email address of the users (i.e. FRA staff submitting an IT ticket), the following data are processed by Atlassian **as data processor**:

- User Account Information, for example:

- Atlassian identifier associated with user account.
- About Me.
- Full name.
- Email address.
- Time zone.

- Personal Identification, for example:

- Location/ Region/ City.
- Company/organization.
- Personal data included in user generated content.

For the purposes of operating the Jira Service Management, Atlassian might process, **as controller**, the following data:

- Personal data relating to or obtained in connection with the operation, support or use of the Services, e.g.: User Account Information, for example pseudonymous Atlassian IDs, Cloud IDs, Site IDs, or Segment Anonymous IDs, to the extent it includes personal data.
- Device and connection information, for example:
 - Cookie information – includes Atlassian IDs not the FRA usernames.
 - Browser information.
- Information on the use of the Services, for example:
 - Event Name (i.e., what action the user performed).
 - Event Timestamp.
 - Page URL.
 - Referring URL.
- Support data.
- Personal data provided through various Atlassian support channels, including for example Atlassian ID, SEN (Support Entitlement Number), username, contact information and any personal data contained within a summary of the problem experienced or information needed to resolve the support case.

3. How do we collect and process your personal data?

3a. Information you provide us:

We collect your name and contact details, as well as other personal data provided in the context of providing the foreseen services as indicated in Section 2 above, directly from you when you submit a ticket through the IT Service management ticketing system (Atlassian Jira Service Management).

3b. Information we collect about you:

In addition, personal data relating to or obtained in connection with the operation, support, or use of the Jira service might be collected when using Atlassian Jira management ticketing service, as indicated in Section 2 above. In those cases, Atlassian acts as data controller as indicated in the Data Processing Addendum mentioned in Section 4 below. If any user generated content is submitted as attachments via support tickets, Atlassian acts as a processor of such personal data.

4. Who is responsible for processing your personal data?

The Agency is the legal entity responsible for the processing of your personal data and determines the objective of this processing activity. The Head of Corporate Services is responsible for this processing operation.

Therefore, FRA is the controller, and Atlassian acts on its behalf as a processor in connection with the provision of the Atlassian Jira Service Management service. Moreover, FRA has signed and filed a [Data Protection Addendum](#) (DPA) with Atlassian, which foresees under the SIDE III framework contract a data protection and security assessment prior to concluding a contract. As mentioned in previous sections, in some cases Atlassian acts as data controller.

5. Which is the legal basis for this processing operation?

The processing of personal data by the IT service management system, which is in line with the Agency's Cloud Strategy 2020-2025, is necessary for the performance of the tasks that the Agency carries out in the public interest on the basis of its Founding Regulation, and in particular, for the management and functioning of the Agency, ensuring that issues faced by its staff are addressed in a timely and efficient manner.

Therefore, the processing is lawful under Article 5.1.(a) of the Regulation (EU) No 2018/1725.

6. Who can see your data?

Access to your data is granted to authorised staff of FRA (designated Digital Services and Facilities staff who use and monitor the back-end of Jira service management platform) and to designated staff of its processor Atlassian (to ensure that the required service is provided as foreseen under the contractual agreement), which is bound by the Data Protection Addendum mentioned in Section 4 above for any processing operation of users' personal data on behalf of FRA deriving from Regulation (EC) 2018/1725.

[Atlassian sub-processors](#) (subject to duty of confidentiality and written agreements with same obligations as Atlassian).

7. Do we share your data with other organisations?

Personal data is processed by the Agency only. In case that we need to share your data with third parties, you will be notified to whom your personal data has been shared with.

8. Do we intend to transfer your personal data to Third Countries/International Organizations

No.

However, Atlassian is a global company which operates within and outside the EU/EEA area. When setting up Jira Service Management offered by Atlassian, it is possible to select that the data should reside in European soil. When this option is selected, the personal data remains pinned within the EU: *"Atlassian data residency allows you to control where the data is hosted in Jira Software, Jira Service Management, and Confluence and allows you to choose to distribute the data globally or to a defined geographic location, such as Europe or the USA"*.

For the purposes of operating FRA's IT ticketing system, the selected location is Europe and hence data is transferred only within the European locations of Atlassian.

In addition, when Atlassian acts as data controller, for functional and account management purposes, the data linked to user's accounts (the personal data that cannot be pinned) might be transferred outside the EU/EEA. Should this occur, only Atlassian identifier associated with users' accounts will be transferred (not names and surnames, nor email addresses). For more information about data residency, please refer to the following [website](#).

9. When will we start the processing operation?

We will start the processing operation from the moment when Atlassian Jira Service Management becomes operational (intended for March 2024), which entails the creation of accounts.

10. How long do we keep your data?

The personal data is kept until the service ends or until the user account is deleted. Upon termination, customer accounts are deactivated within 17 days (for annual subscriptions) after the end of the customer's current subscription period.

Atlassian retains data for deactivated products for 15 days (for evaluation licenses) or 60 days (for Free, **Standard**, and Premium product plans) after the end of the customer's current subscription period. Upon deletion, an archive of the data is kept for an additional 30 days.

11. How can you control your data?

Under Regulation 2018/1725, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information. You are not required to pay any charges for exercising your rights except in cases where the requests are manifestly unfounded or excessive, in particular because of their repetitive character.

We will reply to your request without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

You can exercise your rights described below by sending an email request to it.helpdesk@fra.europa.eu.

a. The value of your consent.

Since the use of the IT service management application is mandatory in accordance with the Agency's internal processes, you are not required to provide your consent.

b. Your data protection rights.

i. Can you access your data?

You have the right to receive information on whether we process your personal data or not, the purposes of the processing, the categories of personal data concerned, any recipients to whom the personal data have been disclosed and their storage period. Furthermore, you can have access to such data, as well as obtain copies of your data undergoing processing.

ii. Can you modify your data?

You have the right to ask us to rectify your data you think is inaccurate or incomplete at any time.

iii. Can you restrict us from processing your data?

You have the right to restrict the processing of your personal data. If you do, we can no longer process them, but we can still store them. In some exceptional cases, we will still be able to use them (e.g. with your consent or for legal claims). You have this right in a few different situations: when you contest the accuracy of your personal data, when the Agency no longer needs the data for completing its tasks, when the processing activity is unlawful, and finally, when you have exercised your right to object.

iv. Can you delete your data?

You have the right to ask us to delete your data when the personal data are no longer necessary for the purposes for which they were collected, when you have withdrawn your consent or when the processing activity is unlawful. In certain occasions we will have to erase your data in order to comply with a legal obligation to which we are subject.

We will notify to each recipient to whom your personal data have been disclosed of any rectification or erasure of personal data or restriction of processing carried out in accordance with the above rights unless this proves impossible or involves disproportionate effort from our side.

v. Are you entitled to data portability?

Data portability is a right guaranteed under Regulation 1725/2018 and consists in the right to have your personal data transmitted to you or directly to another controller of your choice.

In this case, this does not apply for two reasons: I) in order for this right to be guaranteed, the processing should be based on automated means, however we do not base our processing on any automated means; II) this processing operation is carried out in the public interest, which is an exception to the right to data portability in the Regulation.

vi. Do you have the right to object?

When the legal base of the processing is “*necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body*” which is the case in most of our processing operations, you have the right to object to the processing. In case you object, we have to stop the processing of your personal data, unless we demonstrate a compelling reason that can override your objection.

vii. Do we do automated decision making, including profiling?

Your personal data will not be used for automated decision-making including profiling.

12. What security measures are taken to safeguard your personal data?

The Agency has several security controls in place to protect your personal data from unauthorised access, use or disclosure. Moreover, FRA's cloud provider (Atlassian) has in place numerous technical and organisational measures to ensure that your personal is proper safeguarded.

13. What can you do in the event of a problem?

a) The first step is to notify the Agency by sending an email to it.helpdesk@fra.europa.eu and ask us to take action.

b) The second step, if you obtain no reply from us or if you are not satisfied with it, contact our Data Protection Officer (DPO) at dpo@fra.europa.eu.

c) At any time you can lodge a complaint with the EDPS at <http://www.edps.europa.eu>, who will examine your request and adopt the necessary measures.

14. How do we update our data protection notice?

We keep our data protection notice under regular review to make sure it is up to date and accurate.

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