

**RECORD OF PROCESSING ACTIVITY
ACCORDING TO ARTICLE 31 REGULATION 2018/1725¹
NOTIFICATION TO THE DATA PROTECTION OFFICER**

NAME OF PROCESSING OPERATION²: IT Service Management Ticketing System - JIRA

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| Reference number: DPR-2024-207 |
| Creation date of this record: 23/01/2024 |
| Last update of this record: 22/02/2024 |
| Version: 1 |

Part 1 (Publicly available).

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| 1) Controller(s)³ of data processing operation (Article 31.1(a)) |
| Controller: European Union Agency for Fundamental Rights (FRA) Schwarzenbergplatz 11, A-1040 Vienna, Austria Telephone: +43 1 580 30 – 0 Email: contact@fra.europa.eu Organisational unit responsible⁴ for the processing activity: Corporate Services Unit Contact details: it.helpdesk@fra.europa.eu Data Protection Officer (DPO): dpo@fra.europa.eu |

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| 2) Who is actually conducting the processing? (Article 31.1(a))⁵ |
| The data is processed by the FRA itself <input checked="" type="checkbox"/> |
| The data is processed also by a third party (contractor) <input checked="" type="checkbox"/> |
| FRA is the controller in this processing operation, and Atlassian acts on its behalf as a processor in connection with the <u>provision of the Atlassian Jira Management service</u> . |

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

² **Personal data** is any information relating to an identified or identifiable natural person, i.e. someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity. This information may, for example, be the name, date of birth, a telephone number, biometric data, medical data, a picture, professional details, etc.

Processing means any operation or set of operations which is performed on personal data, whether or not by automatic means, 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.

³ In case of more than one controller (e.g. joint FRA research), all controllers need to be listed here

⁴ This is the unit that decides that the processing takes place and why.

⁵ Is the FRA itself conducting the processing? Or has a provider been contracted?

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.

Atlassian Pty Ltd

E-Mail: privacy@atlassian.com

EU Representative:

Atlassian B.V.

E-Mail: eudatarep@atlassian.com

3) Purpose of the processing (Article 31.1(b))

Why are the personal data being processed? Please provide a very concise description of what you intend to achieve with the processing operation. Specify the rationale and underlying reason for the processing and describe the individual steps used for the processing. If you do this on a specific legal basis, mention it as well (e.g. staff regulations for selection procedures).

The purpose of the processing relates to the provision of a cloud IT Service management ticketing system for the Agency (JIRA Service Management provided by Atlassian). It allows the Agency and its staff to log their issues 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.

The users' name and email address, as well as other personal data described in section 5 below are collected directly when they submit a ticket through the FRA IT Service management ticketing system (Atlassian Jira Service Management).

In addition, to operate, support, or use of the Jira service Management, certain personal data (as described in section 5 below) might be collected. In those cases, Atlassian acts as data controller as indicated in the Data Processing Addendum mentioned above.

4) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are being processed?

- | | |
|--|-------------------------------------|
| FRA staff | <input checked="" type="checkbox"/> |
| Non-FRA staff (please specify e.g. Roma community, judges, etc.) | <input type="checkbox"/> |

5) Categories of personal data processed (Article 31.1(c))

Please tick all that apply and give details where appropriate

(a) **General personal data.**

- | | |
|---|-------------------------------------|
| Personal details (name, surname). | <input checked="" type="checkbox"/> |
| Contact details (email address). | <input checked="" type="checkbox"/> |
| Education & Training details | <input type="checkbox"/> |
| Employment details (e.g. work experience, languages, name and type of the employer/organisation, address of the employer/ organisation) | <input type="checkbox"/> |
| Financial details (e.g. financial identification form, bank account information) | <input type="checkbox"/> |
| Family, lifestyle and social circumstances | <input type="checkbox"/> |
| Goods or services provided | <input type="checkbox"/> |
| Other | <input checked="" type="checkbox"/> |

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.

* If any user generated content is submitted as attachments via support tickets, Atlassian acts as a processor of such personal data and Sections 2.2(a) as well as 2.6(a) DPA apply accordingly.

(b) Special categories of personal data (Article 10).

The personal data collected reveal:

- | | |
|--|-------------------------------------|
| Racial or ethnic origin | <input type="checkbox"/> |
| Political opinions | <input type="checkbox"/> |
| Religious or philosophical beliefs | <input type="checkbox"/> |
| Trade union membership | <input type="checkbox"/> |
| Genetic, biometric or data concerning health | <input type="checkbox"/> |
| Information regarding an individual's sex life or sexual orientation | <input type="checkbox"/> |
| N/A | <input checked="" type="checkbox"/> |

(c) Personal data relating to criminal convictions and offences (Article 11)

- | | |
|--|-------------------------------------|
| Criminal record (or similar, e.g. declaration of good conduct) | <input type="checkbox"/> |
| N/A | <input checked="" type="checkbox"/> |

6) Recipient(s) of the data (Article 31.1 (d))

*Recipients are all parties who have access to the personal data. Who will have access to the data **within** FRA? Who will have access to the data **outside** FRA? No need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS).*

Designated **FRA** staff members

Authorised FRA Digital Services staff who use and monitor the back-end of Jira service management platform.

Recipients **outside** FRA:

Designated staff of FRA's 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 2 above for any processing operation of users' personal data on behalf of FRA deriving from Regulation (EC) 2018/1725.

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

7) Transfers to third countries or international organisations (Article 31.1 (e))⁶

If the personal data are transferred outside the European Economic Area or to international organisations, this needs to be specifically mentioned, since it increases the risks of the processing operation.

Transfer outside of the EU or EEA

Yes

No

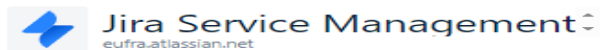
If yes, specify to which country:

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.

⁶ **Processor** in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty. If needed, consult your DPO for more information on how to ensure safeguards.

[← Back to Data Residency](#)



Location

European Union

AWS region: Europe (Ireland), Europe (Frankfurt)

Product status

PINNED

App details BETA

There are no subscribed apps for this product. [Learn more about eligible apps](#)

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, as indicated in the image below. Should this occur, only Atlassian identifier associated with users' accounts will be transferred (not names and surnames, nor email addresses).

| | | |
|---------------------------------------|--|---|
| <p>Jira Service Management</p> | <ul style="list-style-type: none"> • All attachments • Comments • In-product notification data • Knowledge base category data (if integrated with Confluence) • Asset object data and schema configuration data • Jira issues, request types, and field content (including system and custom fields) • Jira search data • Project configuration data (including workflows and custom field configuration) • Queue data • Configuration management databases (CMDB) used for the external asset platform. • SLA configuration data • Any incident management features powered by Opsgenie. Learn about data residency for Opsgenie. | <ul style="list-style-type: none"> • Customer accounts • Product analytics • Data used by Halp |
|---------------------------------------|--|---|

Link to data residency information:

[Understand data residency | Atlassian Support.](#)

Transfer to international organisation(s)

Yes

No

If yes specify to which organisation:

Legal base for the data transfer

Transfer on the basis of the European Commission's adequacy decision (Article 47)

Transfer subject to appropriate safeguards (Article 48.2 and .3), specify:

a) A legally binding and enforceable instrument between public authorities or bodies.

Standard data protection clauses, adopted by

b) the Commission, or

c) the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2) .

d) Binding corporate rules, Codes of conduct , Certification mechanism pursuant to points (b), (e) and (f) of Article 46(2) of Regulation (EU) 2016/679, where the processor is not a Union institution or body.

Subject to the authorisation from the European Data Protection Supervisor:

Contractual clauses between the controller or processor and the controller, processor or the recipient of the personal data in the third country or international organisation.

Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.

Transfer based on an international agreement (Article 49), specify:

Derogations for specific situations (Article 50.1 (a) –(g))

N /A

Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply
In the absence of an adequacy decision, or of appropriate safeguards, transfer of personal data to a third country or an international organisation is based on the following condition(s):

(a) The data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards

(b) The transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request

(c) The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person

(d) The transfer is necessary for important reasons of public interest

(e) The transfer is necessary for the establishment, exercise or defense of legal claims

(f) The transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent

(g) The transfer is made from a register which, according to Union law, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down in Union law for consultation are fulfilled in the particular case

8) Retention time (Article 4(e))

How long will the data be retained and what is the justification for the retention period? Please indicate the starting point and differentiate between categories of persons or data where needed (e.g. in selection procedures candidates who made it onto the reserve list vs. those who didn't). Are the data limited according to the adage "as long as necessary, as short as possible"?

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.

9) Technical and organisational security measures (Article 31.1(g))

Please specify where/how the data are stored during and after the processing; please describe the security measures taken by FRA or by the contractor

How is the data stored?

- | | |
|---|-------------------------------------|
| Document Management System (DMS) | <input type="checkbox"/> |
| FRA network shared drive | <input type="checkbox"/> |
| Outlook Folder(s) | <input type="checkbox"/> |
| CRM | <input type="checkbox"/> |
| Hardcopy file | <input type="checkbox"/> |
| Cloud (give details, e.g. cloud provider) | <input checked="" type="checkbox"/> |
| Servers of external provider | <input type="checkbox"/> |
| Other (please specify): | <input type="checkbox"/> |

The data is processed and stored on Atlassian's cloud.

10) Exercising the rights of the data subject (Article 14 (2))

How can people contact you if they want to know what you have about them, want to correct or delete the data, have it blocked or oppose to the processing? How will you react?

See further details in the Data Protection notice: e-mail to it.helpdesk@fra.europa.eu

Data subject rights

- Right of access
- Right to rectification
- Right to erasure (right to be forgotten)
- Right to restriction of processing
- Right to data portability
- Right to object
- Notification obligation regarding rectification or erasure of personal data or restriction of processing
- Right to have recourse
- Right to withdraw consent at any time