



# Record of processing activity

## Security Logging and Auditing

### Record of EBA activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 (EUDPR)

Nr	Item	Description
<b>Part 1 - Article 31 Record</b>		
1	Last update of this record	01/12/2022
2	Reference number	EBA/DPR/2022/04
3	Name and contact details of controller	<p>Controller: European Banking Authority (EBA), Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France</p> <p>Responsible department: Operations, IT Unit</p> <p>Email address: <a href="mailto:eba-it-dp@eba.europa.eu">eba-it-dp@eba.europa.eu</a></p>
4	Contact details of DPO	<a href="mailto:dpo@eba.europa.eu">dpo@eba.europa.eu</a>
5	Name and contact details of joint controller (where applicable)	Not applicable
6	Name and contact details of processor (where applicable)	<p>1. Microsoft Ireland Operations Limited            Microsoft EU Data Protection Officer<sup>1</sup>            One Microsoft Place            South County Business Park            Leopardstown            Dublin 18 D18 P521 Ireland            Telephone: +353 (1) 706-3117  <a href="https://aka.ms/privacyresponse">https://aka.ms/privacyresponse</a></p> <p>Microsoft Ireland Operations Limited provides enterprise detection and response (EDR) software for IT assets and analysis of its findings</p> <p>2. doIT solutions GmbH            doIT solutions GmbH            Altenhaßlauer Str. 21            63571 Gelnhausen            Deutschland            Telefon: 06051 / 47 47 20</p>

<sup>1</sup> Reference: <https://docs.microsoft.com/en-us/compliance/regulatory/gdpr-data-protection-officer>, accessed 27/07/2021.

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		<p>E-Mail: <a href="mailto:dsb@doit-solutions.de">dsb@doit-solutions.de</a>            Website: <a href="http://www.doit-solutions.de">www.doit-solutions.de</a>            Privacy notice: <a href="https://www.doit-solutions.de/datenschutz">https://www.doit-solutions.de/datenschutz</a></p> <p>doIT solutions GmbH provides analysis of security logs that are collected by security controls installed at EBA's systems</p> <p>3. CertEU            Address:            Rue de la Loi 107            1000 Brussels            Belgium            Website: <a href="https://cert.europa.eu/">https://cert.europa.eu/</a>            Privacy policy: <a href="https://cert.europa.eu/privacy-policy">https://cert.europa.eu/privacy-policy</a></p> <p>CertEU provides analysis of security logs that are collected by security controls installed at EBA's systems</p> <p>4. UniSystems Systemes Informatiques Societe Anonyme            Commerciale Unipersonnelle            Rue des Deux Eglises 26, boite 4            B-1000, Bruxelles            Belgium</p> <p>UniSystems provides EBA IT Unit contractors</p>
7	Short description and purpose of the processing	<p>The EBA processes personal data within the processing activity of 'Security Logging and Auditing' to monitor users and files activities in order to respond to cyberattacks, protect ICT assets from malicious acts, perform Information Security Incident and Personal Data Breach as well as detection, prevention, contention, mitigation, analysis and support of security investigations and inquiries concerning EBA's resources.</p>
8	Description of categories of persons whose data the EBA processes and list of data categories	<p>The EBA processes personal data of the following categories of persons:</p> <ul style="list-style-type: none"> <li>• Internal to the EBA               <ul style="list-style-type: none"> <li>• EBA statutory staff (temporary agents and contract agents);</li> <li>• EBA non-statutory staff (Seconded National Experts);</li> <li>• EBA trainees;</li> <li>• EBA contractors.</li> </ul> </li> <li>• External to the EBA               <ul style="list-style-type: none"> <li>• External individuals involved in cyberattacks, security incidents, personal data breaches, investigations, and inquiries (e.g., National Competent Authorities representative, responsible person or victim of a cyberattack).</li> </ul> </li> </ul> <p>The EBA processes the following categories of personal data:</p> <ul style="list-style-type: none"> <li>• Name, surname, email address, IP address, workstation name.</li> </ul>

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9	Time limit for keeping the data	<p>Logs are transmitted to a centralised system hosted in EBA’s private cloud hosted in a Data Centre located in the European Union (EU), where all data are kept for at most six (6) months. After this period, all data are overwritten.</p> <p>Personal data processed by Microsoft are deleted within the 30 days following the deletion of data subject’s account from the EBA directory.</p>
10	Recipients of the data	<p>Recipients of personal data processed within the context of this processing activity are as follows:</p> <ul style="list-style-type: none"> <li>• Internal to the EBA <ul style="list-style-type: none"> <li>• EBA Information Security Officer;</li> <li>• duly authorised IT Unit staff members.</li> </ul> </li> <li>• External to the EBA <ul style="list-style-type: none"> <li>• duly authorised IT Unit contractors who sign a confidentiality declaration with the EBA and are subject to the <a href="#">EBA Standard on Access Control and Authentication</a>;</li> <li>• CertEU, accessing all security logs;</li> <li>• doIT Solutions, receiving all security logs;</li> <li>• Microsoft receiving logs from the EDR security control;</li> <li>• the European Data Protection Supervisor (EDPS) will be notified of any personal data breach and further investigation may follow.</li> </ul> </li> </ul>
11	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<p>The EBA has entered a contract with Microsoft Ireland Operations Limited under the framework contract DI/076770 between DIGIT, European Commission, and Microsoft.</p> <p>Regarding data transfer, at rest data are stored encrypted on a data centre located in the European Union (EU); in transit data are transmitted encrypted and implemented with cryptographic keys.</p> <p>Data transfers may include the following countries: United States of America, United Kingdom, China (P.R.C.), Serbia, India, Israel, Canada, Switzerland, South Africa, United Arab Emirates, Australia, Chile, Brazil, Egypt, Japan, Republic of Korea, Singapore, and Malaysia.</p> <p>Personal data processed may be transferred outside of the EU through Microsoft’s sub processors, for a limited period of time and for service execution purposes, when outside of the EU. A list of Microsoft’s current sub processors is available at <a href="https://aka.ms/servicesapprovedsuppliers">https://aka.ms/servicesapprovedsuppliers</a>.</p> <p>Microsoft commits itself, in the proposed Custom Data Processing Agreement (DPA), to have in place written agreements with all sub-processors that are at least as restrictive in terms of data protection and security as their data processing agreement with the EU Institutions, Bodies and Agencies.</p> <p>Due to the nature and the complexity of the service provided by a provider of public cloud services, it is highly unlikely that a set of</p>

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		personal information per individual product/service, processing activity and data category can be obtained for each sub-processor used.
12	General description of security measures, where possible	<p>Processing of personal data in the context of this processing activity is carried out pursuant to the <a href="#">EBA Decision (EBA/DC/138)</a> of 29 October 2015 on the security of communication and information systems in the EBA. The EBA adopted <a href="#">Commission Decision (EU, Euratom) 2017/46</a> of 10 January 2017 on the security of communication and information systems in the European Commission.</p> <p>The activities are performed under the <a href="#">EBA Information Security Framework</a>, published on the EBA intranet. Those security controls include: access control and authentication policy and technical controls; backup; audit trails; physical security policy and technical controls; patch management policy; data processing agreements (DPAs) with Microsoft, doIT and UniSystems.</p> <p>The EBA also requests vendors the ISO 27001 certification, meaning the EBA makes sure that they all have in place information security policies, procedures and guidelines.</p>
13	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	<a href="#">Data Protection Notice on Security Logging and Auditing</a>