

Specific Privacy Notice regarding the processing of personal data in the context of the use of Microsoft Teams

Microsoft Teams is a cloud-base application included as part of Office 365 that is provided to users with the aim to offer more flexibility and improve communications and collaboration between stakeholders and the Office. The core capabilities in Microsoft Teams include business messaging, calling, video meetings and file sharing.

The European Banking Authority (hereinafter referred to as ‘the EBA’ or ‘the Authority’) processes personal data provided in connection with the use of Microsoft Teams for communication and collaboration purposes — namely for the organisation of internal and external meetings as well as conversation chats — in accordance with on Regulation (EU) 2018/1725 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data by the Union institutions and 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 (hereinafter referred to as ‘Regulation no. 1725/2018’ or ‘EUDPR’).

The EBA provides you with the information that follows based on Articles 15 and 16 of the EUDPR.

What is the nature of the processing operation and what does the EBA do with your data?

The EBA processes your personal data for organising virtual meetings (internal and/or external) and conversation chats. The personal data is collected and stored in Microsoft’s Cloud servers with the purpose of providing the abovementioned services.

What personal data does the EBA process and who can access it?

The categories/types of personal data processed are the following:

- Content: your meetings and conversations chats, voicemail, shared files, recordings and transcriptions;
- Profile data: data that is shared within the EBA (e.g. e-mail address, profile picture);
- Image and/or video: should the meeting be recorded;

- Call history: a detailed history of the phone calls you make, which allows you to go back and review your own call records;
- Call quality data: details of meetings and call data are available to the EBA system administrators. This allows the Authority's administrators to diagnose issues related to poor call quality and service usage;
- Support/Feedback data: information related to troubleshooting tickets or feedback submission to Microsoft; and
- Diagnostic and service data: diagnostic data related to service usage. This personal data allows Microsoft to deliver the service (troubleshoot, secure and update the product and monitor performance) as well as perform some internal business operations, such as: determine revenue; develop metrics; determine service usage; and conduct product and capacity planning.

In the context of certain meetings, the EBA may organize live web streaming and video or audio recording. In case of video recording, the EBA will as possible arrange for an opt-out facility for meeting participants who prefer their images are not recorded. A consent form will be sent to the participants who agree to the recording prior to the meeting.

Please note neither the EBA, nor Microsoft can control what you share during meetings and conversation chats. The EBA highly advises that you refrain from using Microsoft Teams to disseminate sensitive data – data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data (mental & physical), and data concerning a natural person's sex life or sexual orientation – which either concern yourself or another natural person.

Who is responsible for processing the data?

The controller of the personal data is the Unit or Department of EBA in charge of the organisation of the relevant meeting or event, specified in the invitation letter or in the event registration tool. If a person is not specified, you may contact IT.Support@eba.europa.eu and mention the name of the meeting you attended to get information on the controller.

Who has access to your personal data and to whom is it disclosed?

The personal data is disclosed, under the need to know basis, to the following recipients:

- the EBA staff members and external users included in the Microsoft Team that is used for the exchange of information;
- the EBA's processors, including Microsoft and Microsoft's processors involved in the data processing necessary to provide the service.

No other third parties will have access to your personal data, except if required by law.

How does EBA protect and safeguard your information?

The EBA takes appropriate technical and organisational measures to safeguard and protect your personal data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

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Microsoft Teams has been configured to preserve the confidentiality of the information you exchange by implementing encryption during all communications and in storage, and anonymous access is not authorised.

Microsoft data centers are certified in several security standards, most notably, ISO 27001:2013, CSA-STAR attestation and SOC 1-2-3.

How can you access your personal information and, if necessary, correct it? How can you receive your data? How can you request your personal data to be erased?

You have the right to access, rectify, erase, and receive your personal data, as well as restrict its processing or object to the same, as provided in Articles 17 to 24 of the EUDPR Regulation.

The EBA wants to make sure that your personal information is accurate and up to date. You may ask the EBA to correct or remove information you think is inaccurate.

You can freely withdraw your consent at any time by using the contact details mentioned in this privacy statement. In that case, all processing operations that were based on your consent and took place before the withdrawal of consent remain valid.

Your request will be answered without undue delay, and in any event within one month of receipt of the request. However, according to Article 14(3) of Regulation (EU) 2018/1725, this period may be extended by up to two months where necessary, taking into account the complexity and number of requests. The EBA will inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.

What is the legal basis for processing your data?

The processing of your personal data is necessary for the performance of tasks that the EBA, as an EU Agency, carries out in the public interest, in accordance with Article 5.1(a) of the EUDPR Regulation.

How long can data be kept?

Collected personal data are stored as long as follow-up actions are needed in the context of the meeting or event concerned. For contacting audiences in the future in the context of EBA's activities, EBA may retain personal data in a database, specifically designed for this purpose. If you do not agree with this, please contact the Controller by using the contact information in the invitation letter of in the event registration tool.

As for Microsoft, it commits itself to retain your data for the minimum amount of time necessary to deliver the service.¹

Contact information

If you have any queries concerning the processing of your personal data, you may address them to the Head of IT Unit, at the following email: IT.Support@eba.europa.eu

You shall have right of recourse at any time to the EBA DPO at dpo@eba.europa.eu and to the European Data Protection Supervisor at <https://edps.europa.eu>.

The postal address of the EBA is:

DEFENSE 4 – EUROPLAZA
20 Avenue André Prothin
CS 30154
92927 Paris La Défense CEDEX

You can also find contact information on the EBA's website: <https://eba.europa.eu/contacts>.

¹ <https://docs.microsoft.com/en-us/microsoft-365/compliance/retention-policies-teams?view=o365-worldwide>