



RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

according to Article 31 of [Regulation \(EU\) 2018/1725](#)

Title
Ask EFSA a question – Handling of requests for information

1) Controller(s) of data processing activity (Article 31.1(a))
<p>EFSA unit in charge of the processing activity:</p> <p>The Executive Director is the controller of personal data processing in the context of handling requests for information submitted to EFSA by means of its Relationship Management System. Depending on the subject matter, incoming requests are dealt with internally by the competent units and services, as follows:</p> <ul style="list-style-type: none">- Area of selection "General Question about EFSA" which are general information requests about the role and functioning of EFSA and concerning food & feed safety scientific matters – Engagement & Relations Unit (ENREL) can be contacted writing to Ask@efsa.europa.eu- Area of selection "Question about Scientific Application Process" which are specific requests in relation to regulated products applications within EFSA's food & feed safety scientific risk assessment remit – Front-Desk & Workforce Planning Unit which can be contacted by writing to fdp@efsa.europa.eu- Area of selection "Career Opportunities" which are general questions concerning EFSA staffing and human resources management – which can be contacted writing to recruitment@efsa.europa.eu <p>EFSA Data Protection Officer (DPO): DataProtectionOfficer@efsa.europa.eu</p> <p>Is EFSA a co-controller? No</p> <p>If yes, indicate who is EFSA's co-controller:</p>

2) Who is actually conducting the processing? (Article 31.1(a))
<p>The data is processed by EFSA itself <input checked="" type="checkbox"/></p> <p><i>Indicate the EFSA units or teams involved in the data processing:</i></p> <p>Contact points in ENREL, FDP and HUCAP Units indicated above.</p> <p>The processing operation is conducted together with an external party <input type="checkbox"/></p> <p><i>Please provide below details on the external involvement:</i></p>

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

Personal data are processed to allow for the effective and coherent handling of requests for information submitted to EFSA by means of its Relationship Management System and the production of statistics.

4) Legal basis and lawfulness of the processing (Article 5(a)–(d)):

Processing necessary for:

- (a) a task carried out in the public interest or in the exercise of official authority vested in EFSA
- (b) compliance with a legal obligation to which EFSA is subject
- (c) performance of a contract with the data subject or to prepare such contract
- (d) The data subject has given consent (ex ante, explicit, informed)

Further details on the legal basis:

The processing is necessary for the performance of a task carried out in the public interest as mandated by EFSA's Founding Regulation (EC) No 178/2002 Submitted requests for information are handled in accordance with EFSA's Code of good administrative behaviour.

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

Whose personal data are processed?

- EFSA statutory staff
- Other individuals working for EFSA (consultants, trainees, interims, experts)
- Stakeholders of EFSA, including Member State representatives
- Contractors of EFSA providing goods and services
- The general public, including visitors, correspondents, enquirers
- Relatives of the data subject
- Other categories of data subjects (please detail below)

Further details concerning the data subjects whose data are processed:

Any person submitting a request for information by means of EFSA's Relationship Management system.

6) Type of personal data processed (Article 31.1(c))

a) General personal data

The personal data concerns:

- | | |
|---|-------------------------------------|
| Name, contact details and affiliation | <input checked="" type="checkbox"/> |
| Details on education, expertise, profession of the person | <input checked="" type="checkbox"/> |
| Curriculum vitae | <input type="checkbox"/> |
| Financial details | <input type="checkbox"/> |
| Family, lifestyle and social circumstances | <input type="checkbox"/> |
| Goods and services the person provides | <input type="checkbox"/> |
| Other personal data (please detail): | <input checked="" type="checkbox"/> |

b) Sensitive personal data (Article 10)

The personal data reveals:

- | | |
|---|--------------------------|
| Racial or ethnic origin of the person | <input type="checkbox"/> |
| Political opinions or trade union membership | <input type="checkbox"/> |
| Religious or philosophical beliefs | <input type="checkbox"/> |
| Health data or genetic or biometric data | <input type="checkbox"/> |
| Information regarding the person's sex life or sexual orientation | <input type="checkbox"/> |

Further details concerning the personal data processed:

- Identification & contact data of the person submitting a request for information managed by means of EFSA's Relationship Management system to enable EFSA to send a reply;
- In addition, for statistical purposes the requester's affiliation and country is processed.

7) Recipients of the data (Article 31.1(d))

- | | |
|---|-------------------------------------|
| Line managers of the data subject | <input type="checkbox"/> |
| Designated EFSA staff members | <input checked="" type="checkbox"/> |
| Other recipients (<i>please specify</i>): | <input checked="" type="checkbox"/> |

Staff in EFSA units and services competent on the subject matter of the incoming request and in charge of handling it by means of the EFSA Relationship Management system. As needed, other EFSA units and services may be consulted in order to provide the response.

8) Transfers to recipients outside the EEA (Article 31.1 (e))

Data are transferred to third country recipients:

Yes No

If yes, specify to which third country:

If yes, specify under which safeguards:

Adequacy Decision of the European Commission

Standard Contractual Clauses

Binding Corporate Rules

Memorandum of Understanding between public authorities

The provision of the Salesforce CRM services may entail the transfer of personal data outside the European Union, by Salesforce, its affiliates or its sub-processors processing the data. A '[Data Processing Addendum](#)' (DPA) forms part of EFSA's subscription to the Salesforce CRM (see below point 9), providing for 'Standard Contractual Clauses' as an Annex to it. The Salesforce DPA with SCC annex is considered to provide an appropriate safeguard for the data transfers in accordance with Article 48(2)(b) of Regulation (EU) 2018/1725.

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

How is the data stored?

On EFSA's Document Management System (DMS)

On a shared EFSA network drive or in an Outlook folder

In a paper file

Using a cloud computing solution (please detail the service provider and main characteristics of the cloud solution, e.g. public, private)

On servers of an external service provider

On servers of the European Commission or of another EU Institution

In another way (*please specify*):

Please provide some general information on the security measures applied:

Requests for information are to be submitted and are handled by means of EFSA's Relationship Management system 'Connect.EFSA' based on the cloud-based (SaaS) platform provided by <https://www.salesforce.com/> CRM software. A data protection compliance check was carried out based on the contract documents of the Salesforce service provider. Overall,

the contract terms and conditions show a good level of compliance with data protection rules and principles (GDPR). Also a Security Plan on Salesforce is available. Salesforce data centres for storage of EFSA data are located in Germany and France. There are no systematic data transfers outside the European Economic Area.

10) Retention period (Article 4.1 (e))

Personal data processed in the context of submitted requests for information are kept for five years after the query has been answered to allow for the effective and coherent handling of recurrent questions and the production of statistics.

11) Consultation with the Information Security Officer

Was the ISO consulted on the processing operation ?

Yes No

If yes, please provide some details on the consultation with the ISO:

The ISO was consulted on the Salesforce CRM tool *inter alia* supporting the processing of requests for information and a Security Plan on Salesforce is available.

12) Information given to data subjects (Articles 15 and 16)

Has information been provided to data subjects on the way their data is processed including how they can exercise their rights (access, rectification, objection, data portability)? Usually this information is provided in a Privacy Statement, specifying the controller's contact details. As possible, please provide a link to the relevant Privacy Statement or a description.

A general privacy statement on the 'Connect.EFSA' CRM tool, as well as specific statement on 'Ask EFSA a question' is available in the entry point to the tool on the EFSA website - <https://connect.efsa.europa.eu/RM/s/termofuse>

Last update of this record: 29/03/2023

Reference: DPO/COM/3