



RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

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

Title
Transactional services by means of ServiceNow workflow
1) Controller(s) of data processing activity (Article 31.1(a))
<p>EFSA unit in charge of the processing activity: Corporate Services (CORSER)</p> <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 X</p> <p><i>Indicate the EFSA units or teams involved in the data processing:</i></p> <p>The recipients of personal data through the electronic workflow are in general the request handlers and process owners according to the various service types managed by means of the 'ServiceNow' electronic workflow. The electronic workflow ensures that requests are directed on a need-to-know basis to the request handler in charge, who may be EFSA staff members or consultants, as follows:</p> <ul style="list-style-type: none"> Building management and logistic services: CORSER Unit staff, consultants, security guards IT-related requests and services: EFSA ServiceDesk (consultants) Finance-related services: Finance Unit staff HR-related services: HuCap Unit staff (People Services) Legal: LA Unit staff (Ethics Adviser) Scientific data management and publication services: DATA Unit staff, CORSER Unit staff ServiceNow 'Single Point of Contact' (SPOC) for system administration and trouble-shooting with restricted access on a 'need-to-know' basis and under contractual confidentiality obligation. <p>The processing operation is conducted together with an external party X</p> <p><i>Please provide below details on the external involvement:</i></p> <p>EFSA Service Desk is populated with external consultants, security guards</p>

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

The purpose of the data processing is to efficiently and effectively manage standard transactional service requests from EFSA staff by means of the electronic workflow tool 'ServiceNow' gradually rolled out, covering the BuS service catalogue and scientific data management and publication services. Additional services may be added in the future.

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 data processing operation is necessary for the management and functioning of EFSA as mandated by its Founding Regulation (EC) No 178/2002

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:

The electronic workflow supports transactional service requests that can be submitted by all categories of staff working at EFSA, including statutory staff, trainees, interim staff and consultants.

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 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 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 data of the service requester and his/her contact details (name, email, unit) as well as those of the case handler;
- Any personal data submitted with a specific service request and in any files attached to the submission;
- Personal data in any feedback or comment submitted after service delivery and ticket closure.

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 type="checkbox"/>

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

<https://www.servicenow.com/> supporting the service request workflow is a SaaS cloud system. Contractual safeguards in relation to the ServiceNow license subscription and technical and organisational measures have been put in place to ensure that the requirements of Regulation (EU) 2018/1725 are complied with. The contractual safeguards stem from an interinstitutional Master Subscription Service Agreement, complemented with a Data Processing Addendum and Standard Contractual Clauses that the European Commission has negotiated with ServiceNow on behalf of most EUIs, including EFSA. The system is accommodated with state-of-the-art security measures, and data is stored securely in ISO certified data centres located inside the European Union (NL, IRL). Function-based access control and account management has been established. Data transfers outside EEA may happen in observance of Chapter V of EDPR/GDPR. More specifically, ServiceNow may engage with subprocessors for the service provision under warranty of the application of Standard Contractual Clauses.

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:
See information provided on ServiceNow SaaS tool under point 8

10) Retention period (Article 4.1 (e))

After closure, service requests including the personal data of the requester are kept for 5 years, to allow for the effective and coherent handling of recurrent requests and the production of statistics concerning EFSA services.

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 has assessed compliance of ServiceNow tool with information security standards.

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 data protection notice is available to users in the EFSA Intranet page of the service catalogue - <https://efsa815.sharepoint.com/sites/services-and-support>

Last update of this record: 03/08/2021

Reference: DPO/GOV/13