



RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

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

Title
EFSA Relationship Management

1) Controller(s) of data processing activity (Article 31.1(a))
<p>EFSA unit in charge of the processing activity: Knowledge, Innovation & Partnership</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 <input type="checkbox"/></p> <p><i>Indicate the EFSA units or teams involved in the data processing:</i></p> <p>The controller can be contacted writing to https://connect.efsa.europa.eu/RM/s/new-ask-efsa-request</p> <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's Relationship Management is based on the cloud-based (SaaS) platform provided by https://www.salesforce.com/ CRM software.</p>

3) Purpose of the processing (Article 31.1(b))
<p>The purpose of EFSA's Relationship Management System and the collection and further processing of your personal data therein is:</p> <ol style="list-style-type: none"> 1. To manage EFSA partnerships with various stakeholders, with storage of contact details on individuals and organisations and their representatives following registration by EFSA or as self-registration by the individual or organisation concerned. EFSA will include registered stakeholders in its mailing lists for the dissemination of newsletters and alerts, as well as for general and targeted promotion, notifications and campaigns in the field of EFSA's mission. The Relationship Management system incorporates an opt-out feature for registered stakeholders from inclusion in the mailing list of EFSA communications; 2. To provide one or more of the following interactive services : <ul style="list-style-type: none"> • Pre-submission advice to potential applicants or notifiers in the area of EFSA's

food/feed safety risk assessment in accordance with Article 32a of EFSA's Founding Regulation (EC) No 178/2002 ('**PSA**');

- The Notification of Studies by food/feed business operators, laboratories or other testing facilities in accordance with Article 32b of EFSA's Founding Regulation (EC) No 178/2002 ('**NoS**');
- The organisation by EFSA of Public Consultations on its draft scientific outputs ('**PC**');
- The submission and follow-up by EFSA to requests for public access to documents in accordance with Regulation (EC) No 1049/2001 ('**PAD**');
- The submission and follow-up by EFSA to requests for information on its mandates and activities ('**AskAQuestion**');
- The Mandate Negotiation and Protocol Development, involving EFSA and DG SANTE of the European Commission ('**MN**').

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 | <input checked="" type="checkbox"/> |
| (b) compliance with a legal obligation to which EFSA is subject | <input type="checkbox"/> |
| (c) performance of a contract with the data subject or to prepare such contract | <input type="checkbox"/> |
| (d) The data subject has given consent (ex ante, explicit, informed) | <input type="checkbox"/> |

Further details on the legal basis:

EFSA maintains a network of stakeholders operating in the fields within its mission and provides the interactive services listed above.

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

Whose personal data are processed?

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

Further details concerning the data subjects whose data are processed:

Representatives of the following broad categories of stakeholders are included in EFSA's Relationship Management system or may benefit from the interactive services supported by the tool:

- EFSA customers: representatives at EU Institutions and EU Member State organizations in EFSA's remit
- EFSA Partners: contact persons at Academia (universities and public research institutes), EU Agencies, international partners (international organisations, European Neighbourhood programme, third countries)
- Business operators in EFSA's remit: Applicants, Notifiers acting on behalf of Applicants
- Laboratories and testing facilities, including notifiers, clinical research organisations, academia
- EFSA Stakeholders *sensu stricto*: Associations of practitioners, business and food/feed industry, consumer organisations, distributors and HORECA, farmers and primary producers, NGOs and advocacy groups
- The general public: Citizens having a residence in the EU
- Media: Journalists, bloggers, influencers

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 & contact data: person's title, first name, last name, job title, affiliation with full address of the organisation, department, work email & phone number, business mobile phone.

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

Line managers of the data subject

Designated EFSA staff members

Other recipients (*please specify*):

The EFSA Relationship Management System is accessible to:

- EFSA staff in all Units,
- Members of EFSA's constituent bodies: the members of the EFSA Management Board and the EFSA Advisory Forum, representing EU Member State national food safety authorities,
- The network of EFSA Focal Points in the EU Member States, acting as an interface between EFSA and national food safety authorities, research institutes and other stakeholders,
- The network of organisations operating in the fields within EFSA's mission in accordance with Art. 36 of EFSA's Founding Regulation,
- EFSA contractors, authorised to use such data for the sole purpose of the performance, management and follow-up of a particular contract (example: the organisation of EFSA meetings or conferences),
- Institutions or bodies having a legitimate purpose of audit, of the exercise of supervisory tasks or in charge of judicial proceedings in relation to EFSA: the Internal Audit Service, the EU Court of Auditors, the EU Ombudsman, OLAF, the EU Court of Justice, the European Data Protection Supervisor.

The subsections of the system supporting specific interactive services (NoS, PC, PAD, AskAQuestion) are accessible on a need-to-know basis to EFSA staff in charge of the relevant process, information on which is provided in the specific privacy statement for each service.

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	<input type="checkbox"/>
Binding Corporate Rules	<input checked="" type="checkbox"/>
Memorandum of Understanding between public authorities	<input type="checkbox"/>

Further information:
The Salesforce platform is based in the EU, Salesforce intra-group transfers are covered by BCRs and there are no subprocessors involved in onward transfers.

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

How is the data stored?

On EFSA's Document Management System (DMS)	<input type="checkbox"/>
On a shared EFSA network drive or in an Outlook folder	<input type="checkbox"/>
In a paper file	<input type="checkbox"/>
Using a cloud computing solution (please detail the service provider and main characteristics of the cloud solution, e.g. public, private)	<input checked="" type="checkbox"/>
On servers of an external service provider	<input type="checkbox"/>
On servers of the European Commission or of another EU Institution	<input type="checkbox"/>
In another way (<i>please specify</i>):	<input type="checkbox"/>

Please provide some general information on the security measures applied:

EFSA's Relationship Management is 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 Salesforce 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. The CRM customisation based on Salesforce interfaces with other technology building blocks supporting the risk assessment process of EFSA. Microsoft Azure provides for the connection between these technology building blocks, as well as the identity management (role-rights and various workflows).

10) Retention period (Article 4.1 (e))

All personal data is retained for as long as the data subject maintains his profile in the system except in case of editing or deletion by means of the self-service feature. Thereafter, the data will be deactivated with a retention period of three years and accessible only to authorised EFSA staff. After three years retention, deactivated data will be deleted automatically from the system.

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 and a Security Plan concerning the use of 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 – EFSA Relationship Management, as well as Specific Privacy Statements for specific services supported by the system is available, here: <https://connect.efsa.europa.eu/RM/s/termofuse>

Last update of this record: 21/03/2022

Reference: DPO/COM/8