

PRIVACY NOTICE FOR CIRCABC@OLAF

1. DESCRIPTION OF THE PROCESSING OPERATION

CIRCABC@OLAF exists to facilitate the exchange of information and resources between the European Anti-Fraud Office, OLAF, acting as controller, and its correspondents. CIRCABC@OLAF is a bespoke installation of the European Commission's [CIRCABC](#) (*Communication and Information Resource Centre for Administrations, Businesses and Citizens* (DPR-EC-01666)) application.

The purpose of the collection and use of personal information within CIRCABC@OLAF is to enable users to exchange information or resources with OLAF. The exchange occurs by means of *Interest Groups* managed by OLAF staff with appropriate permissions applied to the group, information and users based on the need to know.

Your contact details (email address, first name and last name) are needed to identify you as an OLAF correspondent and may be used for contacting you. To be identified by CIRCABC@OLAF, a data subject needs a valid account with login and password provided by the *EU Login service*. *EU Login* is the European Commission's user authentication service (DPR-EC-03187).¹

Identification by CIRCABC@OLAF requires a second form of *EU Login* verification to supplement the login username and password. This can be provided, for example, by a mobile phone via SMS or use of the *EU Login* mobile application.

The processing of your data will not be used, or re-used, for automated decision making including profiling.

The documents exchanged via the application will only be stored for a maximum of 30 days to enable the exchange. Metadata of users may be further registered, where relevant, in document registers to record that the exchange has taken place.

2. LEGAL BASIS FOR THE PROCESSING

We process your personal data, because:

¹ More information on EU Login, how to register an account, its treatment of personal data and relevant privacy statement can be found at: <https://webgate.ec.europa.eu/cas>

(a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body.

(b) the data subject has given consent to the processing of his or her personal data one or more specific purposes.

For OLAF's users:

The legal basis for this processing is Article 5.1 (a) of Regulation (EU) 2018/1725 as it is necessary for the performance of the tasks carried out in the public interest.

The processing is also necessary with a view to complying with article 33.1(a) (b) (c) Regulation 2018/1046.

For non-OLAF users:

The legal basis for the processing is Article 5.1 (d) of Regulation (EU) 2018/1725 as data subjects consent to the processing of his or her personal data. The use of CIRCABC@OLAF by data subjects is voluntary based on a desire to exchange information or resources with OLAF. Accepting this privacy notice is required before entering the application and using the service.

3. CATEGORIES OF PERSONAL DATA COLLECTED

OLAF collects personal data in order to enable this processing operation.

The personal data accessible from the CIRCABC@OLAF application is as follows:

Mandatory information: Identification data (username, first name, last name, email address)

Optional information: Contact information (title, organisation, phone number, postal address, fax, url address, open text field/description and an image/logo).

The identification data is retrieved by an automatic process from *EU Login* and the European Commission's Central User Database, which is stored at the Data Centre of the European Commission. The Data Centre of the European Commission is bound to comply with Regulation (EU) N° 2018/1725 and with any Commission's security decision and provision established by the Directorate General of Security and Human Resources for this kind of servers and services (Decision 2017/46).

The optional contact information is provided by the data subject at their own discretion.

4. WHO HAS ACCESS TO YOUR INFORMATION AND TO WHOM IS IT DISCLOSED?

OLAF staff responsible for carrying out this processing operation has access to your personal data.

Within any *Interest Group* to which are granted access by OLAF Staff, your personal identification data may be visible to other non-OLAF data subjects in the same group who have been granted similar access permissions.

5. HOW DO WE PROTECT AND SAFEGUARD YOUR INFORMATION?

In order to protect your personal data, a number of technical and organisational measures have been put in place. Technical measures include appropriate actions to address online

security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the data being processed. Organisational measures include restricting access to the data to authorised persons with a legitimate need to know for the purposes of this processing operation.

6. HOW LONG DO WE KEEP YOUR DATA?

Your personal data may be retained by OLAF in CIRCABC@OLAF until your user account for this application is deactivated.

Deactivation can occur in one of two ways:

- 1) Specific Request: Upon request by the user themselves
- 2) Automatically: After one year following deactivation of all *Interest Groups* to which the user has access.

An *Interest Group* can be deactivated upon request or will be automatically deactivated after five years of inactivity.

OLAF sensitive non classified documentation may be exchanged using CIRCABC@OLAF using an appropriate *Interest Group* and appropriate file permission based on a need to know basis and such documentation would be kept for maximum of 30 days.

Deactivation removes personal data from the CIRCABC@OLAF application managed by OLAF. EU Login credentials and personal data remain part of that European Commission's user authentication service and subject to the requirements/obligations of that application (see again DPR-EC-03187).

7. WHAT ARE YOUR RIGHTS AND HOW YOU CAN EXERCISE THEM?

You have the right to request access to your personal data, rectification or erasure of the data, or restriction of their processing.

Where you have consented to provide your personal data to OLAF for the present processing operation, you can withdraw your consent at any time by notifying the controller. The withdrawal will not affect the lawfulness of the processing before the consent was withdrawn.

Any request to exercise one of those rights should be directed to the Controller (OLAF-FMB-DATA-PROTECTION@ec.europa.eu). Where you wish to exercise your rights in the context of one or several specific processing operations or files, please provide their description and reference(s) in your request.

No restrictions would apply on data subject rights for this processing operation..

8. CONTACT DETAILS OF THE DATA PROTECTION OFFICER

You may contact the Data Protection Officer of OLAF (OLAF-FMB-DPO@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation(EU)2018/1725.

9. RIGHT OF RECOURSE

You have the right to have recourse to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation(EU)2018/1725 have been infringed as a result of the processing of your personal data by OLAF.