

December 2018

PRIVACY NOTICE FOR CBIS IDENTITY ACCESS

1. DESCRIPTION OF THE PROCESSING OPERATION

The OLAF Identity & Access Management System (IAMS) is a directory service for IT applications in the suite of systems called Core Business Information Systems (CBIS). The system provides authentication and access control services for all applications and systems of the CBIS secure IT environment.

The purpose of this processing operation is to ensure that only authorised persons have access to OLAF's core IT systems and to allow investigation of security incidents.

Authorisation is done with the use of personal OLAF badges (smartcards) containing 3 of your fingerprints minutiae data (i.e. the numeric result of a one-way biometric computation algorithm). The latter are not collected, nor stored, nor processed by the rest of the system but stay only in the smartcard.

As a user of the CBIS system, you are obliged to enrol. A refusal to enrol would result in an inability to have access to the CBIS system.

Data controller, in charge of determining the purposes and means of the processing of the personal data concerned is unit OLAF.C2.

The data processing, notably the set of operations and means to manage the personal data concerned, is managed by unit OLAF.C2. Your data is not subject to automated decision making, including profiling.

2. LEGAL BASIS FOR THE PROCESSING

The legal basis for this processing is Article 5 paragraph 1.(a) of Regulation(EU) 2018/1725; Article 287 of the EC Treaty; Article 17 of the Staff Regulations; Regulation 883/2013; Commission Decision 1999/352; Commission Decision 2001/844/EC, ECSC, Euratom (security provisions); Commission Decision 2006/3602/EC concerning security of information systems; Commission's IT security policy (PolSec); OLAF Information Security Policy.

3. CATEGORIES OF PERSONAL DATA COLLECTED

The following personal data is stored in the IAMS: name, staff number, Directorate, Unit, Sector, smartcard number, access control information (user's access rights) and an indication of whether the staff member has been vetted, and if so, at what level.

The provision of the personal data is mandatory to meet a statutory requirement. Possible consequences of failure to provide the data are the unauthorized access to IT equipment and potential security breaches.

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

Personal data concerned is accessed by OLAF.C2 staff authorised to carry out this processing operation.

Data is disclosed to competent staff in order to monitor the good functioning of the IAMS and apply security controls on audit trails.

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 for a maximum of 6 months.

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. You also have the right to object to the processing of your personal data.

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.

Exceptions based on Regulation 2018/1725 may apply.

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/XX have been infringed as a result of the processing of your personal data by OLAF.