01 - Name of processing	EUROPEAN RAILWAY AGENCY DATABASE OF INTEROPERABILITY AND SAFETY (ERADIS)
02 - Reference	21
03 - Submission Date	19-03-12
04 - Last update	13-09-21
05a - Controller	GIGANTINO Anna
05b - Unit-Sector	Analysis and Monitoring Unit
05c - Controller's email	AOD.aam@era.europa.eu
06 - DPO	DataProtectionOfficer@era.europa.eu 120 Rue Marc Lefrancq, 59300 Valenciennes, France Tel.+33 (0) 32 70 96 500
07 - Name and contact details of joint controller (where applicable)	
08a - Who is actually conducting the processing? (Article 31.1(a))	The data is processed by ERA (responsible unit) itself
09 - Purpose of processing	The purpose of this database is to make publically available documents provided for by Directives (EU) 2016/797, 2016/798, 2012/34/EU, Regulation (EC) No 1371/2007, Commission Implementing Regulations (EU) No 402/2013 and 445/2011.
10a - Data Subjects	• Staff from rail sector representative bodies, national rail bodies/organisations. • Agency staff – members of the staff in charge of managing the relevant service.
08b - Name and contact details of processor (where applicable)	Unisystems Information Technology SA for troubleshooting the application. For cloud-based services related to Microsoft Azure Active Directory, Microsoft acts as data processor. Contact details: Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland https://docs.microsoft.com/bs-cyrl-ba/compliance/regulatory/gdpr-data-protection-officer In compliance with the terms of the Art. 27 of the GDPR, Microsoft Ireland Operations Limited is Microsoft's representative in the European Union that offers customer support through Microsoft's Privacy web form, located at http://go.microsoft.com/?linkid=9846224. The Microsoft Data Protection Officer is Mr Steve May.

10b - Personal data	The collected personal data for the Stakeholders (defined as "Guest") account type are the following:Identity •Name ("Last name" + "First name") •User Principal Name (The UPN is the login ID for the user and equivalent to the email of the contact info) •User type ("Member") •Object ID (system string) •Issuer (based on Microsoft notation) •Account creation time •Account last sign-in date Contact info •Email •Alternate email •Proxy address	Personal data collected through the Audit Trail logs are the following: Timestamp Username Source IP address Session ID Action details Invoked URL In addition, ERA uses "first-party cookies" used to:• store visitor preferences (cookies consent)• make operational the ERATV application• gather analytics data (about user behaviour), if accepted.

11 - Time limit for keeping the data

Personal data for the "Guest" account type is retained as follows:

As long as users are recorded as active. If the user is registered through a third party, the period of activity will usually correspond to a contractual link with that party, but the Agency will consider the user active if it continues to receive user's information (in the case of an automatic link) or until user's account expires. After the expiration date, data is kept

› in the Azure Active Directory for a period of 30 days, before its deletion,

› 6 months after the deletion in logs and back-up media.

Azure AD general service provisions

At the expiration of the subscribed services, two consecutive and different 90 days periods apply: - A first 90 days period start at expiration. During this period data are still available for the ERA to download the data. This period is intended to give some extra time to the customer should it had not already downloaded all data it wants to keep at the expiration. - A second 90 days period starts right at the end of the first 90 days during which Microsoft will be deleting all the copies of the data. At the end of this second period (so 180 days after the expiration of the subscription) all the data shall have been deleted.

It applies regardless of the location of the data, so if data are duplicated in several locations, all copies in all these locations shall be deleted. These data deletion processes are audited yearly as part of our compliance with ISO27018.

In case of incident the data will be kept for analysis for a longer period to establish evidence or to defend a right in a legal claim pending before a court.

Regarding the Audit Trail logs, they are kept for 12 months before deletion.

12 - Recipients of the data

Designated ERA staff for the purposes of administration, operation and troubleshooting of the application.

• Authorised Agency staff dealing with the provisioning of Azure Active Directory accounts.

• Microsoft's personnel managing the databases on Microsoft cloud servers and their sub-processors' personnel on a need-to-know basis.

• Regarding the Audit Trail logs, they are accessible only to the ERADIS administrators and the IT security officer.

All recipients of the data are reminded of their obligation not to use the data for any further purpose other than the ones for which they were collected.

13 - Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?

Transfers of personal data outside the European Union are not foreseen.

However, diagnostic data covered by contractual rules may be sent to Microsoft outside EU territory.

Transfer subject to appropriate safeguards (Article 48.2 and .3) – Standard data protection clauses as per Inter-Institutional License Agreement signed by the EU Commission and Microsoft.

Microsoft commits to have in place written agreements with all sub-processors that are at least as restrictive in terms of data protection and security as their data processing agreement with the EC.

The activities of all sub-processors are in scope of third-party audits.

14 - How is data stored? What are the security measures implemented?	Free access to ERADIS is granted to public to read data, while a username and a password are needed for data submission. Therefore, a registration of personal data is requested to obtain credentials in order to get an authorised access and to be contacted in case of any need.
	All personal data are processed only by designated staff and stored on Microsoft cloud servers located in Europe, which abide by the ERA's IT security rules and standards. For more information about the ERA Authentication Service (EAS) allowing the authenticated users to have access to the ICT resources in a manner that ensures the confidentiality, integrity and availability of the information assets please refer to the Azure Active Directory relevant record in this register (74) and privacy notice (https://intranet.era.europa.eu/Data-Protection/Lists/Records/Attachments/77/Privacy%20Statement%20-%20Azure%20Active%20Directory.pdf).
	In addition, in order to protect the content against inappropriate behaviours (e.g. certificates mismatching or hacking attempts) an Audit Trail has been implemented in ERADIS, recording all user' actions. The fields in the recorded logs are the following:
	Timestamp
	Username
	Source IP address
	Session ID
	Action details
	Invoked URL
	This functionality is activated only for logged-in users and can be activated/ deactivated at any time.
	Regarding cookies, at every visit ERADIS prompts to accept cookies or to modify settings, in order to:
	• not be tracked by user's browser (for analytics services, advertising networks, etc.) and/or
	• opt-out from analytics data collection (for further details read Web analytics privacy in Matomo).
	Microsoft Corporation, as processor, is committed under the terms of the Interinstitutional License Agreement and related documents to respect the obligations of the GDPR. The nature and the purpose of the processing is related to the provision of the Online Service pursuant to Customer's volume licensing agreement.
15 - For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable) see the data protection notice	Privacy notice on Agency website (https://www.era.europa.eu/content/data-protection) and cookies statement in the application homepage.
15a - Data subject rights	Right to have access; Right to rectify; Right to erase ("right to be forgotten); Right to object
16 - Legal Basis	Article 37(3) of Regulation (EU) 2016/796 of the European Parliament and of the Council of 11 May 2016 on the European Union Agency for Railways and repealing Regulation No 881/2004;#169
17 - Lawfulness of processing	The processing is lawful under Art. 5(a) of Regulation EU 2018/1725 repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC: ((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).
18 - Data minimisation	Free access to ERADIS is granted to public to read data, while a username and a password are needed for data submission. Therefore, personal data are collected to allow registered users to submit/modify data as per defined access rights.
19 - Accuracy	For data submission users provide the needed data.

20 - Threshold assessment	
21 - Special category data	None
22 - DPIA	None
23 - Link to the Threshold assessment-Risks	
24 - Other related documents	