

## EDPS record of processing activity

Record of EDPS activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

Nr.	Item	Description
		<b>RESTRICTED LAPTOPS (RTOP)</b>
1.	Last update of this record	26/09/2023
2.	Reference number	74
3.	Name and contact details of controller	<p><a href="#">European Data Protection Supervisor (EDPS)</a> <b>Postal address:</b> Rue Wiertz 60, B-1047 Brussels <b>Office address:</b> Rue Montoyer 30, B-1000 Brussels <b>Telephone:</b> +32 2 283 19 00 <b>Email:</b> <a href="mailto:edps@edps.europa.eu">edps@edps.europa.eu</a></p> <p>Responsible department or role: Local Security Officer</p> <p>Contact form for enquiries on processing of personal data to be preferably used: <a href="https://edps.europa.eu/node/759">https://edps.europa.eu/node/759</a></p> <p>The EDPS is controller for the processing of its staff's personal data for the assignment of laptops.</p>



Nr.	Item	Description
		<p>The European Commission (EC) is a separate controller for the processing of personal data for the cyber-security of the laptops and for the security of EUCI.</p> <p>The RTOP solution is part of the EC's register of processing activities - record <a href="#">DPR-EC-00682.3</a>. For more information regarding the processing of personal data by the EC, please refer to the EC record.</p> <p>Human Resources and Security (HR)            DG HR.DS.4 - Information Security and Inspections            Email: <a href="mailto:ec-security-infosec@ec.europa.eu">ec-security-infosec@ec.europa.eu</a></p>
4.	Name and contact details of DPO	<a href="mailto:dpo@edps.europa.eu">dpo@edps.europa.eu</a>
5.	Name and contact details of joint controller (where applicable)	Not applicable
6.	Name and contact details of processor (where applicable)	Not applicable
7.	Short description and purpose of the processing	<p>In specific audits and inspections, the EDPS may need to handle EU classified information (EUCI). This information requires accredited IT solutions, for both, hardware and software. The EDPS service provider for EUCI (Commission HR.DS) offers laptops and a secure network with which it is possible to handle EUCI up to a level of EU-RESTRICTED (RTOP, abbreviation for RESTRICTED LAPTOP). These laptops are personalised and are constantly monitored to protect against cyber-attacks and mishandling of EUCI.</p> <p>DG HR.DS.4 "Information Security and Inspections" collects and uses EDPS staff's personal information to give access to the RUE-X/RTOP system and to allow an efficient management of the RUE-X system.</p>



Nr.	Item	Description
8.	Description of categories of persons whose data the EDPS processes and list of data categories	<p>The following personal data of EDPS staff members who have been assigned a RTOP laptop is processed and provided to the EC: the name, the family name, corporate email address, corporate phone number, building location and corporate IP address of the RTOP.</p> <p>For detailed information regarding the data categories processed by the EC, see <a href="#">EC-00682.3</a>.</p>
9.	Time limit for keeping the data	<p>Personal data related to the assignment of the laptop to the EDPS staff will be kept by the EDPS up to one year after the person left the function that required the laptop.</p> <p>For detailed information regarding the applicable retention period applied by the EC, see <a href="#">EC-00682.3</a>.</p>
10.	Recipients of the data	Commission HR.DS.4
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No transfers.
12.	General description of security measures, where possible.	<p>The EDPS applies the need to know principle to the information related to the assignment of the laptops.</p> <p>Please see the security measures applied by the EC in the <a href="#">EC-00682.3</a>.</p>
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	Data protection notice published internally.

