



RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

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

Title
Two-factor authentication based on DUO
1) Controller(s) ¹ of data processing activity (Article 31.1(a))
<p>EFSA unit in charge of the processing activity: Transformation Services</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 X</p> <p><i>Indicate the EFSA units or teams involved in the data processing:</i></p> <p>EFSA Transformation services & Service Desk for assistance and trouble-shooting</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 has a license for all its staff to use DUO as two-factor authentication tool</p>
3) Purpose of the processing (Article 31.1(b))
<p>Two-factor authentication for login to the secure connection to EFSA network and connection between workstations and providing VPN connection for remote access to management systems such as SYSPER</p>
4) Legal basis and lawfulness of the processing (Article 5(a)–(d)):
<p><i>Processing necessary for:</i></p>

¹ The controller decides on the purposes and means of the data processing. In case of joint controllership (e.g. systems of the European Commission applied by EFSA or jointly with another agency), EFSA is a co-controller.

(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"/>
<i>Further details on the legal basis:</i>		

5) Description of the categories of data subjects (Article 31.1(c))		
<i>Whose personal data are processed?</i>		
	EFSA statutory staff	<input checked="" type="checkbox"/>
	Other individuals working for EFSA (consultants, trainees, interims, experts)	<input checked="" type="checkbox"/>
	Stakeholders of EFSA, including Member State representatives	<input type="checkbox"/>
	Contractors of EFSA providing goods and services	<input type="checkbox"/>
	The general public, including visitors, correspondents, enquirers	<input type="checkbox"/>
	Relatives of the data subject	<input type="checkbox"/>
	Other categories of data subjects (please detail below)	<input type="checkbox"/>
<i>Further details concerning the data subjects whose data are processed:</i>		

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"/>
<i>Further details concerning the personal data processed:</i>	
User login information, (private) mobile phone number of staff to allow two-factor authentication	

7) Recipients of the data (Article 31.1(d))	
Line managers of the data subject	<input type="checkbox"/>
Designated EFSA staff members	<input checked="" type="checkbox"/>
Other recipients (<i>please specify</i>):	<input type="checkbox"/>

8) Transfers to recipients outside the EEA (Article 31.1 (e))	
Data are transferred to third country recipients:	
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
If yes , specify to which third country:	
If yes , specify under which safeguards:	
Adequacy Decision of the European Commission	<input type="checkbox"/>
Standard Contractual Clauses	<input checked="" type="checkbox"/>
Binding Corporate Rules	<input type="checkbox"/>

Memorandum of Understanding between public authorities

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

How is the data stored?

On EFSA's Document Management System (DMS)

On a shared EFSA network drive or in an Outlook folder

In a paper file

Using a cloud computing solution (please detail the service provider and main characteristics of the cloud solution, e.g. public, private)

On servers of an external service provider

On servers of the European Commission or of another EU Institution

In another way (*please specify*):

Please provide some general information on the security measures applied:

DUO data centres are located in Germany and Ireland. DUO may engage subprocessors for the service provision under warranty of application of Standard Contractual Clauses

10) Retention period (Article 4.1 (e))

As long as authorised EFSA users require VPN connection and/or remote access to EFSA management systems.

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 has assessed compliance of DUO with information security standards.

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.

Information note with instruction for installation of DUO tool on user mobile device available.

Last update of this record: 20/11/2020

Reference: DPO/GOV/12