

RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

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

Personal data processing in the context of Content creation and collaboration by means of Microsoft Office 365 online

1) Controller(s)¹ of data processing activity (Article 31.1(a))

EFSA unit in charge of the processing activity: Corporate Services (CORSER)

EFSA Data Protection Officer (DPO): DataProtectionOfficer@efsa.europa.eu

Is EFSA a co-controller?

If yes, indicate who is EFSA's co-controller:

2) Who is actually conducting the processing? (Article 31.1(a))

The data is processed by EFSA itself ☒

Indicate the EFSA units or teams involved in the data processing:

Personal data processing using the Microsoft Office 365 software package happens throughout EFSA and de facto by every staff member employed by or working for EFSA, including statutory staff, trainees, interim workers, consultants, experts.

The processing operation is conducted together with an external party ☒

Please provide below details on the external involvement:

Limited data processing is performed by the Microsoft Corporation and its subprocessors, pertaining to:

- diagnostics on the use of the Office 365 software tools under the EFSA license subscription, to ensure the tools are secure, up to date and performing ;
- service-generated data (SGD) such as IP addresses, time stamps, user events ;
- any active engagement of Microsoft for trouble-shooting and providing assistance to users ;
- on a need-to-know-basis, other personal data for Microsoft security operations.

3) Purpose of the processing (Article 31.1(b))

The Microsoft Office 365 software package supports all content creation and management as well as collaboration use cases at EFSA, as far as these are not supported by alternative tools or systems.

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.

4) Legal basis and lawfulness of the processing (Article 5(a)–(d)):

Processing necessary for:

- | | |
|---|-------------------------------------|
| (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 checked="" type="checkbox"/> |

Further details on the legal basis:

In general, the Microsoft Office 365 software package supports EFSA in its functioning as an EU agency.

The data subject's consent may apply in specific circumstances or for specific features, such as for instance the *ex ante* consent of the audience for recording a virtual meeting organised by means of MS Teams, the possibility to add a picture to the personal Microsoft user account, etc.

The contractual provisions with Microsoft are governed with an European Commission Inter-Institutional Licensing Agreement ILA-2025.

5) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are processed?

- | | |
|---|-------------------------------------|
| 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 checked="" type="checkbox"/> |
| Contractors of EFSA providing goods and services | <input type="checkbox"/> |
| The general public, including visitors, correspondents, enquirers | <input checked="" type="checkbox"/> |
| Relatives of the data subject | <input type="checkbox"/> |
| Other categories of data subjects (please detail below) | <input type="checkbox"/> |

Further details concerning the data subjects whose data are processed:

- Staff employed by or working for EFSA, including statutory staff, trainees, interim workers, consultants, experts
- External users exchanging content and interacting with EFSA by means of Microsoft software tools and systems or by means of other compatible tools and systems.

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 checked="" 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 checked="" 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"/> |

Further details concerning the personal data processed:

User information via secured EFSA login (single sign-on) or guest account.

Any personal data in content created and exchanged by users through the Microsoft software tools as well as collaboration and exchange during virtual meetings supported by M365 Teams.

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 checked="" type="checkbox"/> |

The functionality of Outlook/Exchange (email), M365 Teams, SharePoint, OneDrive, Co-Pilot or other M365 tools, meant for content creation and management, collaboration and information sharing, makes it impossible to provide a meaningful mapping of data recipients. The range of recipients extend to virtually all active users of the M365 software tools as well as any recipients of content through other compatible software tools, for instance via email or over the internet.

8) Transfers to recipients outside the EEA (Article 31.1 (e))

Data are transferred to third country recipients:

Yes ☒ No ☐

If yes, specify to which third country:

If yes, specify under which safeguards:

Adequacy Decision of the European Commission ☒

Standard Contractual Clauses ☐

Binding Corporate Rules ☐

Memorandum of Understanding between public authorities ☐

The Microsoft service provider may transfer customer data outside the EEA for the purpose of diagnostics and trouble-shooting or security operations in line with the ILA-2025 Agreement and Chapter V of Regulation 2018/1725.

By means of Microsoft's EU Data Boundary commitment, international data transfers are reduced as possible - <https://learn.microsoft.com/en-us/privacy/eudb/eu-data-boundary-learn>.

Microsoft Corporation is certified to the EU-U.S. Data Privacy Framework and transfers of personal data are governed by the EU-U.S. Data Privacy Framework.

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:

The data storage at rest for content in Office 365 online software tools (Exchange Online, SharePoint, OneDrive) is inside the EU.

10) Retention period (Article 4.1 (e))

The conservation period of content created or managed by means of the MS Office 365 software, depends on their categorisation, for instance as part of the EFSA record and document management system.

Email messages in Outlook (Exchange online) are kept for maximum one year.

SGD and diagnostic data is kept by Microsoft and its processor for up to 180 days.

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 Microsoft Office 365 online software package 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 and instructions on the Microsoft Office 365 online software tools is available to staff on the EFSA SharePoint Intranet portal, in the first place as part of the 'New World of Working' (NWOW) training modules delivered to staff throughout 2019.

Additionally, specific instruction is available, for instance concerning the recording of videoconferenced meetings by means of M365 Teams in consideration of data subjects' rights (consent) and following prior information to the relevant meeting audience.

Last update of this record: November 2025

Reference: DPO/GOV/14