



Specific Privacy Notice – (M365 Guests)

Processing data in the context of Microsoft 365 (M365) Services Guest access

The European Banking Authority (EBA) processes your personal data to grant you guest access to M365 services¹. The EBA processes your personal data based on Regulation (EU) 2018/1725 (EUDPR).

The following information is provided as established in Articles 15 and 16 of the EUDPR.

Who is the controller?

The EBA is the controller with regard to the data processing activities described in this data protection notice.

For more information on the EBA, please consult the EBA website <https://www.eba.europa.eu>.

What personal data do we process, for what purpose, who can access it and how long do we keep them?

Related to the provision of the service, EBA process three different categories of guest user data, all of which may include personal data. These categories are:

1. **Identification data** is the guest user's email address (as depicted by the user's organization). This information is copied to all Office 365 data centres around the globe used to provide the service to allow global access and access control to the EBA's environment in Office 365.
Note that identification data is visible to everyone having access to the EBA M365 environment.
2. **Content data** is any content uploaded to the Office 365 platform by users, such as documents (e.g. Word, Excel documents), and multimedia (e.g. video recordings). Such data is stored by in Office 365 but not otherwise processed by the service.
3. **Service generated data** contains information related to the usage of online services, which are the user IP address, creation time, site URL and user email address. This data is generated by events that are related to user activities in Office 365.

¹ Those services include Teams, Office 365, Azure AD and per case SharePoint Online.

Personal data will be processed for the following purpose:

The European Banking Authority (EBA) processes personal data to allow participants to access and use communication and collaboration functionality in the context of performing Agency tasks, including: Communication and collaboration using Microsoft Teams; Collaboration on documents using Microsoft SharePoint Online; Use of integrated Office 365 functionality within these tools.

The EBA will keep the personal data for the time necessary to fulfil the purpose of collection or further processing, more in particular:

- Identification data, i.e. guest user email address
 - for as long as the guest user account is active, and
 - 90 days after deletion of the guest user account
- Content data
 - up to 90 days upon expiration/termination of the subscription
- Service generated data
 - Until the business purposes for which the data was collected or transferred have been fulfilled

Why do we process your personal data and under what legal basis?

The processing of your personal data by the EBA is lawful since it 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 body².

Will the processing of your personal data involve any transfer outside of the EU?

Identification data and content data are stored with the EU/EEA and will not leave that territory. If users access the Office 365 service from outside the EU/EEA, personal data may be transferred to a corresponding location in order to provide the service.

Service generated data is not necessarily processed outside of the EU. Microsoft is authorized to transfer it to Microsoft Corp., located in the USA, and the network of sub-processors. This type of data contains information on the usage of the service. The data is aggregated before being transferred but may contain identifiable information. This data transfers are bound by Standard Contractual Clauses (SCC) and a custom Data Processing Agreement (DPA)³. Furthermore, Microsoft's privacy notice is accessible [here](#).

What are your rights regarding your personal data?

You have the right of access to your personal data and to relevant information concerning how we use it. You have the right to rectify your personal data. Under certain conditions, you have the right to ask that we delete your personal data or restrict its use. You have the right to object to our processing of your personal data, on grounds relating to your particular situation, at any time.

² Article 5.1 (a) of the Regulation 2018/1725.

³ Article 48 of the Regulation 2018/1725.

We will consider your request, take a decision and communicate it to you. For more information, please see Articles 14 to 21, 23 and 24 of the Regulation.

You can send your request by post in a sealed envelope or via email (see section on contact details below).

You have the right to lodge a complaint

If you have any remarks or complaints regarding the way we process your personal data, we invite you to contact the Data Protection Officer (DPO) of the EBA (see section on contact details below).

You have, in any case, the right to [lodge a complaint with the European Data Protection Supervisor](#), our supervisory authority for data protection matters.

Contact details for enquiries regarding your personal data

Should you wish to contact the EBA, we encourage you to do so by email: eba-it-db@eba.europa.eu by stating in the subject “Data Protection Enquiry”.

If you wish to contact the DPO of the EBA personally, you can send an e-mail to dpo@eba.europa.eu or a letter to the postal address of the EBA marked for the attention of the DPO of the EBA.

The postal address of the EBA is DEFENSE 4 – EUROPLAZA, 20 Avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France.

You can also find contact information on the EBA’s website: <https://www.eba.europa.eu/contacts>