

Data protection statement on the processing of personal data for Bot Protection Service

Protecting your privacy is of the utmost importance to the European Patent Office (EPO). We are committed to protecting your personal data and ensuring respect for data subjects' rights when performing our tasks and providing our services. All data of a personal nature that identify you directly or indirectly will be processed lawfully, fairly and with due care.

The processing operations described below are subject to the EPO Data Protection Rules ([DPR](#)).

The information in this statement is provided in accordance with Articles 16 and 17 DPR.

The EPO's bot protection service is based on the assumption that it is unprofitable for a bot operator to automatically attempt to access up websites if increased computing power is required on its systems. Friendly Captcha is a system that makes it more difficult for website visitors to use websites using automated programs and scripts (so-called "bots"). For the purpose of better protecting the EPO's publicly-facing services from bots maliciously running the account registration functionality, the EPO has integrated a Friendly Captcha program code ("widget") into the EPO websites to be protected.

1. What is the nature and purpose of the processing operation?

This data protection statement relates to the processing of personal data within the context of bot protection service of EPO.

EPO websites' visitors' personal data are processed to make it dynamically more difficult and discourage the usage of EPO websites by automated programs/scripts ("bots"); specifically, for protecting the account registration page against bots attempting to create accounts maliciously. For this purpose, when a visitor attempts to enter some input text/sign in the EPO protected website, the visitor's device (e.g. computer) will be asked to complete an arithmetic task ("puzzle" or "puzzle query").

The processing is not intended to be used for any automated decision-making, including profiling.

Your personal data will not be transferred to recipients outside the EPO which are not covered by Article 8(1), (2) and (5) DPR unless an adequate level of protection is ensured. In the absence of an adequate level of protection, a transfer can only take place if appropriate safeguards have been put in place and enforceable data subject rights and effective legal remedies for data subjects are available, or if derogations for specific situations as per Article 10 DPR apply.

2. What personal data do we process?

The following categories of personal data are processed for Externals::

- Physical and/or Digital Identifiable Assets Working e-mail address
 - Workstation's Hostname (Physical or Virtual)

- Browsing Information

- URL
- Browser User Agent
- Answer to an arithmetic problem solved on the user's device
- Network Interaction History
- Browsing Date and Time
- Number of requests from the (hashed) IP address per period
- IP Address

3. Who is responsible for processing the data?

Personal data are processed under the responsibility of EPO Principal Directorate CIO, acting as the EPO's delegated data controller.

External contractors involved in providing services may also process personal data, which can include accessing it.

4. Who has access to your personal data and to whom are they disclosed?

Personal data may be disclosed to third-party service providers for provision of the anti-bot solution.

Personal data will only be shared with authorised persons responsible for the necessary processing operations. They will not be used for any other purposes or disclosed to any other recipients.

5. How do we protect and safeguard your personal data?

We take appropriate technical and organisational measures to safeguard and protect your personal data from accidental or unlawful destruction, loss or alteration and unauthorised disclosure or access.

All personal data are stored in secure IT applications in accordance with the EPO's security standards.

For personal data processed on systems not hosted on EPO premises, the providers processing the personal data have committed in a binding agreement to comply with their data protection obligations under the applicable data protection legal frameworks. The EPO has also carried out a privacy and security risk assessment. These systems are required to have implemented appropriate technical and organisational measures such as: physical security measures, access and storage control measures, securing data at rest (e.g. by encryption); user, transmission and input control measures (e.g. network firewalls, network intrusion detection system (IDS), network intrusion protection system (IPS), audit logging); conveyance control measures (e.g. securing data in transit by encryption).

6. How can you access, rectify and receive your data, request that your data be erased, or restrict/object to processing? Can your rights be restricted?

You have the right to access, rectify and receive your personal data, not to be subject to a decision based solely on automated processing, to have your data erased and to restrict and/or object to the processing of your data (Articles 18 to 24 DPR).

If you would like to exercise any of these rights, please write to the delegated data controller at DPOexternalusers@epo.org. In order to enable us to respond more promptly and precisely, you always need to provide certain preliminary information with your request. We therefore encourage you to fill in this form [form](#) and submit it with your request.

We will reply to your request without undue delay and in any event within one month of receipt of the request. However, Article 15(2) DPR provides that this period may be extended by two further months where necessary in view of the complexity and number of requests received. We will inform you of any such delay.

7. What is the legal basis for processing your data?

Personal data are processed on the basis of Article 5 (a) of the DPR i.e. processing is necessary for the performance of a task carried out in the exercise of the official activities of the European Patent Organisation or in the legitimate exercise of the official authority vested in the controller, which includes the processing necessary for the Office's management and functioning.

8. How long do we keep your data?

Personal data will be kept only for the time needed to achieve the purposes for which it is processed. Personal data eventually stored in Friendly Captcha are deleted in 30 days at the latest.

9. Contact information

If you have any questions about the processing of your personal data, please write to the delegated data controller at DPOexternalusers@epo.org.

You can also contact our Data Protection Officer at DPOexternalusers@epo.org.

Review and legal redress

If you consider that the processing infringes your rights as a data subject, you have the right to request review by the controller under Article 49 DPR and, if you disagree with the outcome of the review, the right to seek legal redress under Article 50 DPR.