

## **Data protection statement on the processing of personal data within the framework of the Operational reporting information used internally on the Tableau / BI4you platform**

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.

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

This data protection statement relates to the processing of personal data on the Tableau / BI4you platform. On the BI4YOU platform, the data is reported based on SAP tables loaded and transformed in various systems. The access to the tables is reserved to a limited number of Power Users and the roles to view the SAP tables at the source is given following a standardized process managed by BIT (BOSS team).

Following a formal request for extraction by the power user, certain SAP tables and reports are made available for the reporting tools.

Here, several tables are joined to produce the final report.

Exceptionally, when an automatic extraction is not possible, a manual download to an excel is performed for further analysis.

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.

The processing of personal data is necessary for:

- Documenting the author of a respective entry
- Aggregate entries per team, site, groups
- Calculate cycle times per entry involving multiple approvals
- Escalations in case of non-compliance (reminders).

### **2. What personal data do we process?**

The following categories of personal data of EPO employees and externals are processed:

#### **Employment information**

Business unit division

Job title role

Personnel number

**Personal identification**

First Name

Surname

**User Account information**

User ID

**Employees****Employment information**

Business unit division

Job title role

Personnel number

**Personal identification**

First Name

Surname

**User Account Information**

User ID

**Externals:****Contact Information**

Contact Details

Phone Numbers

**Employment Information**

Business Unit Division

Company Entity

Contract Type

Job Title Role

Office Location

**Financial**

Bank Account Information

Bank Account Number

**Personal Identification**

First Name

Full Name

Signature

Surname

**3. Who is responsible for processing the data?**

Personal data are processed under the responsibility of the Principal Director Procurement and Vendor Management, PD 4.7, acting as the EPO's delegated data controller.

Personal data are processed by the EPO staff involved in managing the initiative, project or activity of Central Procurement referred to in this statement.

External contractors involved in internal IT staff and external contractors which can include accessing it for service and maintenance purposes.

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

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.

Access to the aggregated reports is given to the end users after they are added to reporting groups in Bi4YOU or to specific dashboards.

Access to tables within the reporting platform is given to a limited number of users, after it is cross-checked with the SAP roles.

#### **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. Appropriate levels of access are granted individually only to the above-mentioned recipients.

All personal data included in the reports for BI4YOU (Tableau Desktop) are stored in secure IT applications according to the security standards of EPO. These include:

- User authentication: all workstations and servers require login, mobile devices require login to the EPO enclave, privileged accounts require additional and stronger authentication;
- Access control (e.g. Role-based access control to the systems and network, principles of need-to-know and least privilege): separation into administrative and user roles, users have minimum privileges, reduction of overall administrative roles to a minimum;
- Logical security hardening of systems, equipment and network: 802.1x for network access, encryption of endpoint devices, AV on all devices
- Physical protection: EPO access controls, additional access controls to datacentre, policies to lock offices;
- Transmission and input controls (e.g. audit logging, systems and network monitoring): security monitoring with Splunk;
- Security incidence response: 24/7 monitoring for incidents, on-call security expert.

In principle, the EPO has adopted a paperless policy management system; however, if paper files containing personal data need to be stored on EPO premises, they are locked in a secure location with a restricted access.

#### **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 [PDProcurement-dpl@epo.org](mailto:PDProcurement-dpl@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](#) 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 DPR:

- a) Processing necessary for the management and functioning of the EPO, not all processing operations required for the functioning of the EPO are explicitly mandated by EPC;

In addition, personal data is collected and processed in accordance with the Financial Regulations (Budget Implementation Directive, Tender Guidelines, Directive on Contracts, Directive supplementing certain provisions of the Financial Regulations)

## **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.

The reports are available on the platform until they become obsolete (i.e. process changes) or no longer viewed by the users. Once created, dashboards are automatically updated with the latest data or when other requirements are presented to the Power user.

The retention period depends on the time the process is active and it is based on the data retention policies of the underlying tools (SAP).

## **9. Contact information**

If you have any questions about the processing of your personal data, please write to the delegated data controller at [PDCProcurement-DPL@epo.org](mailto:PDCProcurement-DPL@epo.org)

You can also contact our Data Protection Officer at [dpo@epo.org](mailto:dpo@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.