

PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data

1. Introduction

The European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (hereafter, 'eu-LISA') is committed to protect your personal data and to respect your privacy. eu-LISA collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data

The information in relation to processing operation "Contract Monitoring Tool" undertaken by the Procurement and Contract Management Unit (PCU) of eu-LISA is presented below.

2. Why and how do we process your personal data?

PCU collects and uses your personal information to enable access to contract's data, to follow up, report, analyse and to support planning of the future contracts. On every contract's signature, the selected contract's data is entered by authorised Procurement Officers into the Contract Monitoring Tool and is accessed by financial actors to support the business operation.

Your personal data will not be used for an automated decision-making including profiling.

Your personal data processed may be reused for the purpose of procedures before the EU Courts, national courts, or the European Court of Auditors.

3. On what legal ground(s) do we process your personal data

We process your personal data, because:

(a) processing is necessary for the management and functioning of the agency.

4. Which personal data do we collect and further process?

In order to carry out this processing operation PCU collects the following categories of personal data:

- Responsible Unit, as per eu-LISA structure
- First and Last Name of users (procurement officers, OIA, PM)
- Authentication data (user principal name and identifier)
- Pseudonymous Identifier

- IP address and approximate location, session ID, device identification, timestamp, user operation.

The provision of personal data is mandatory to ensure the ability of the users and the Agency to perform its business functions. If you do not provide your personal data, possible consequences may arise, such as: inability to perform required business functions or denial of access to eu-LISA's systems.

We have obtained your personal data from the device that you have used to access the web interface of the tool or by a direct input inside the web user interface of the tool.

5. How long do we keep your personal data?

PCU only keeps your personal data for the time necessary to fulfil the purpose of collection, namely:

- Personal data in contract data and metadata: up to 93 days
- Personal data in security logs: up to 90 days
- Personal data in audit logs: 365 days
- Personal data in backups: 365 days
- Pseudonymised personal data captured in system-generated service logs (e.g., activity and usage logs for monitoring, security, and compliance purposes): 180 days

When determining the maximum retention periods, the Agency takes also into account possible legal recourses, legal, auditing, archiving and reporting obligations.

The retention periods for personal data in files apply only to the processing operation undertaken by Corporate Services Unit and do not cover the primary processing operations of other departments involving files, for which the retention periods are defined separately in the relevant departmental privacy policies.

6. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to eu-LISA staff responsible for supporting this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The following data recipients will have access to your personal information within the context of this processing activity:

- eu-LISA's responsible staff and contractors, financial actors, using Contract Management Tool;
- eu-LISA's IT support teams, eu-LISA IT administration teams and eu-LISA security operations teams have read/write access to collected personal data and derived activity logs;
- Microsoft Ireland Operations Limited in Ireland is a data processor;
- Microsoft Corporation US is a sub-processor. In other words, the processor has delegated certain processing tasks to it.
- Pseudonymised personal data captured in system generated service logs could be processed by Microsoft Corporation's sub-sub-processors in third countries, using remote access on a need-to-know basis via Virtual Desktop Infrastructure (VDI), located in the United States with automated scripts. Personal data transfer to sub-sub-processors in third countries is subject to the terms of the Standard Contractual Clauses implemented by Microsoft Corporation. The list of the sub-processors in third countries as of May 2026:

Sub-sub-processor name	Sub-sub-processor headquarters
Akvelon, Inc.	United States
Allegis Group Holdings, Inc.	United States
Allyis, Inc. (Tech Mahindra group)	United States
Apex Systems, LLC	United States
Aptly Technology Corporation	United States
Beyondsoft Consulting, Inc.	United States
Blueprint Technologies, LLC	United States
Capgemini America, Inc.	United States
Centific Technologies, Inc. (Pactera)	United States
Cognizant Technology Solutions	United States
Concentrix Corporation	United States
Csi Interfusion, Inc. (ChinaSoft)	United States
Dxc Technology Services LLC	United States
Ernst & Young, LLP	United States
Experis (Manpower Group)	United States
Harman Connected Services, Inc.	United States
Hcl America, Inc.	United States
Hi-Tech Talents LLC	United States
Infosys Limited (US entity)	United States
Insight Global, Inc.	United States
Latentview Analytics Corporation	United States
Launch Consulting (The Planet Group)	United States
Maq LLC	United States
Mu Sigma Business Solutions, LLC	United States
Tata Consultancy Services Ltd. (US entity)	United States
Teleion Consulting, LLC	United States
Telus International AI, Inc. (Lionbridge)	United States
Valorem, LLC	United States
Wicloud Corporation	United States
LTIMindtree Limited	India
Sonata Software Limited	India
Wipro Limited	India
Shanghai Wicresoft Co., Ltd.	China
Matchpoint IT Ltd.	Israel

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

If you are accessing Contract Management Tool from third countries (outside EU) you should use a Client Virtual Private Network (VPN) solution that terminates within EU geography before connecting to the service; this ensures that your content data is processed only on EU-based infrastructure.

7. What are your rights and how can you exercise them?

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a).

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor.

8. Contact information

- The data controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the data controller EULISA_CMT@EULISA.EUROPA.EU.

- The Data Protection Officer of eu-LISA

You may contact the Data Protection Officer (dpo@eulisa.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- The European Data Protection Supervisor (EDPS)

If you cannot resolve the matter with eu-LISA's Data Protection Officer, or if you have a reason not to contact him/her, you can complain to the European Data Protection Supervisor if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the data controller. You can find instructions here: https://www.edps.europa.eu/data-protection/our-role-supervisor/complaints_en.