

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 “**GitHub Environment**” undertaken by **eu-LISA's Platform and Infrastructure Unit (PIU)** is presented below.

This privacy statement covers only the processing activities for which eu-LISA acts as a data controller. To the extent GitHub processes personal data as independent controller, please consult the dedicated privacy notices and information available on GitHub's websites [GitHub way of processing personal data as independent controller](#)).

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

eu-LISA collects and uses your personal information to give you access to the GitHub environment and facilitate project communication and evolution, while ensuring accuracy, accountability and alignment with eu-LISA's security standards.

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 processing is necessary for the management and functioning of the Agency. The legal basis under Regulation (EU) 2018/1725 is Art. 5 (1):

- (a) processing 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 body;

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

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

Identification and contact detail data: full name, username (incl. author name in GitHub's repository), display name, email address (these are emails created in Azure EntraID).

e-Communication and connection data: IP Address, audit logs.

Authentication data: user ID, user credentials, tokens, or integration with identity providers (e.g., corporate Single Sign-On).

No processing of special categories of data (like health data) takes place.

5. How long do we keep your personal data?

eu-LISA only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing. The following table explains the established retention period per category of personal data:

Categories of personal data	Data retention period
Identification and contact detail data	90 days upon account disabling
Author name (within the repository)	30 days upon disabling or immediately upon deletion of the account or immediately at the code deletion whichever comes first
Authentication/Azure EntraID Data	90 days upon account disabling
Audit Logs, e-communication data	90 days upon account disabling

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

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

Access to your personal data is provided to designated eu-LISA staff responsible for carrying out 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. Your personal data will also be provided - to the extent necessary- to Microsoft Ireland Ltd, under its capacity as service provider of GitHub. Neither eu-LISA nor the data processor transfer personal data to locations outside the EU/EEA.

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

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 of your personal data carried out pursuant to Article 5(1)(a) or the right to data portability.

Nevertheless, you should be informed that by virtue of Article 25 of Regulation (EU) 2018/1725 and of the Internal Rules laid down under Decision No 2021-096 Rev 1 of the Management Board, one or several of these rights may be restricted for a temporary period of time inter alia on the grounds of prevention, investigation, detection and prosecution of criminal offences.

As a general rule, you will be informed on the principal reasons for a restriction unless this information would cancel the effect of the restriction as such.

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 and make a complaint concerning your exercised rights or potential restrictions of them.

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.servicedesk@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)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) 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.