

## PRIVACY NOTICE – Skype for Business (record reference number: 39)

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*Skype for Business involves processing of personal data, which shall comply with Regulation (EU) N° 2018/1725<sup>1</sup> (the “Regulation”).*

This privacy notice explains how the SESAR JU uses any information you give to us, and the way we protect your privacy. Furthermore, it describes the rights you have as a data subject and how you can exercise these rights.

SESAR JU protects the fundamental rights and freedoms of natural persons and in particular their right to privacy with respect to the processing of personal data.

We provide the following information based on articles 14 to 16 of the Regulation.

### What is the purpose of the processing?

The purpose of the processing activity is the internal communication (calls, meetings, chats) between SESAR JU staff.

### Which personal data do we process?

- a) Meeting/call related data (e.g. outgoing and incoming telephone numbers, email addresses of meeting attendees, call/meetings dates/times, etc.)
- b) The content of chat messages in Skype for Business can be stored in the Skype for Business client and in the user's mailbox, and can be accessed by the end-user.
- c) For internal contacts, Skype for Business depends on the corporate active directory for contacts utilisation but also includes presence information (available, busy, do not disturb, etc.).

### Under what legal basis do we process your personal data?

- Public Interest article 5(1)(a) of Regulation 2018/1725

### Who is the controller and other actors involved in the processing?

Controller: The SESAR JU, legally represented by Florian Guillemet, Avenue Cortenbergh 100, 1000 Brussels

Joint controller(s): EUROCONTROL

### How is SESAR JU processing the personal data?

#### Call Logs

**What This Feature Does:** Call Logs enables the user to store a record of their Skype for Business voice calls in a Microsoft Outlook folder.

**Information Collected, Processed, or Transmitted:** Information about voice calls, such as the start time, end time, duration, and call participants, will be stored in the Outlook Conversation History folder. Meeting subject and location can also be logged by selecting Outlook as the personal information manager on the Personal tab of the Options dialog box. Call Logs does not store the content of voice calls. No information is sent to Microsoft.

**Use of Information:** The user can use Call Logs to track and view their call history. The content of voice calls is not stored.

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<sup>1</sup> Regulation (EU) N° 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (“EUDPR”).

### **Contact Card**

**What This Feature Does:** The Contact Card displays contact, presence, and location information about you and the people within your organization, in both Skype for Business and recent versions of Outlook. The contact card also provides one-click access to communicate with someone. For example, you can send an instant message, start a call, or send an email message directly from someone's contact card.

**Information Collected, Processed, or Transmitted:** The static information in the Contact Card is collected from the enterprise's corporate directory (such as Active Directory). The dynamic information, such as calendar free/busy information is retrieved from Microsoft Exchange Server; telephone numbers can be retrieved from the corporate directory or entered manually by the user; and presence information is managed by Skype for Business using the Outlook Calendar (if enabled by the user) or entered manually by the user. The Lync server shares this information with other people within the organization. No information is sent to Microsoft.

**Use of Information:** The Contact Card is used to view the contact, location and presence information of people within the organization. The amount of information displayed to a user's Skype for Business and Outlook contacts can be controlled by setting "privacy relationships" and enabling or disabling Privacy Mode

**Calendar information:** You can control if users see your calendar information via the "Change permissions for viewing Free/Busy information" in the Microsoft Outlook options menu.

### **Conversation History**

**What This Feature Does:** Conversation History allows you to store previous, recent, or missed instant message conversations and statistics about your voice conversations (such as date, time, duration and caller information) in the conversation history folder of Microsoft Outlook and retrieve them via the Conversations tab in Skype for Business.

**Information Collected, Processed, or Transmitted:** The content of instant-message conversations and statistics about voice conversations (such as date, time, duration and caller information). The content of voice calls and presentations is not stored. No information is sent to Microsoft.

See <https://www.sesarju.eu/dataprotection> for more information.

### **How do we protect and safeguard your information?**

- Staff dealing with this processing operation is designated on a need-to-know basis
- Access control and technical measures such as physical locks and/or secure connections and firewalls
- Appropriate technical and organisational security measures, giving due regard to the risks inherent in the processing and to the nature of the personal data concerned
- Secure transfer of data
- Windows 10 access to an active user account: Password renewed every 40 days

### **Who can access to your personal data and to whom is it disclosed?**

- Data subject themselves
- Designated staff of SJU IT responsible of SJU ICT supplier (=EUROCONTROL) for system operation and maintenance, in case of troubleshooting or investigation of security incidents

## What are your rights and how can you exercise them?

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. In addition, you have the right not to be subject to a decision based solely on automated processing of data, including profiling, if such decision has legal effect on him or her, except for certain situations, such as entering into a contract (as required by articles 14-16 & 24 of the Regulation). You can exercise your rights by sending an email at [ict-coordination@sesarju.eu](mailto:ict-coordination@sesarju.eu).

Information on action taken on the data subject's request to exercise her/his rights shall be provided without undue delay and in any case within one month of receipt of the request. In case of complex or voluminous requests, this period may be extended by another two months, in which case the JU will inform the data subject.

Data subjects have the **right to withdraw their consent at any time** by sending a written request to [ict-coordination@sesarju.eu](mailto:ict-coordination@sesarju.eu). Please note that withdrawing your consent does not affect the lawfulness of any processing based on your consent before this consent is withdrawn.

The content of these rights is detailed in the [Data Protection Notice page in SJU website](#) which contains also information about the contact points and recourse (including EDPS <http://www.edps.europa.eu> and [edps@edps.europa.eu](mailto:edps@edps.europa.eu), and SJU DPO [sju.dataprotection@sesarju.eu](mailto:sju.dataprotection@sesarju.eu)) as well as detailed information on the exercise of the rights.

Possible restrictions as laid down in Article 25 of the Regulation and the upcoming SJU decision on restrictions may apply.

## How long is the data retained?

- Chat messages are stored in the Skype for Business client, only until the user closes the client or the computer is restarted. Unread Skype for Business messages are sent to MS Outlook as a notification, and chat conversations are stored in the conversation history folder of MS Outlook. This data is stored in the user's mailbox and retained until users delete them or their MS Outlook account is terminated. The content of voice calls and presentations is not stored.

## Complaints, concerns and recourse

Should you have any complaint or concern you may contact:

- the Data Protection Officer of the SESAR JU at [sju.data-protection@sesarju.eu](mailto:sju.data-protection@sesarju.eu), and
- the ICT coordination team at [ict-coordination@sesarju.eu](mailto:ict-coordination@sesarju.eu),

In addition, as a data subject, you have a right to recourse to the European Data Protection Supervisor (EDPS) at any time by e-mail to [edps@edps.europa.eu](mailto:edps@edps.europa.eu) or a letter to the EDPS postal address marked for the attention of the EDPS DPO:

European Data Protection Supervisor, Rue Wiertz 60, B-1047 Brussels, Belgium

For more information on the EDPS, please consult their website: <https://edps.europa.eu>

## Additional information

More information on Data Protection at the SESAR JU can be obtained in the [SJU register of data processing operations](#). A relevant privacy notice is available in IDMS and the [SJU website](#).