

OPEN CYBER SITUATIONAL AWARENESS MACHINE (OPENCSAM)

Record of processing activity	
Title	Open Cyber Situational Awareness Machine (OpenCSAM)
Name and contact details of controller	ENISA, Operational Cooperation Unit, opencsam@enisa.europa.eu
Name and contact details of DPO	dataprotection@enisa.europa.eu
Name and contact details of Joint Controller	N/A
Name and contact details of processor	The data processor of this processing operation is Eau de Web company, based in Romania, responsible for the development and technical support of the platform.
Purpose of the processing	<p>OpenCSAM is an Open Source Intelligence tool aimed at supporting the EU cybersecurity blueprint stakeholders from the EU Institutions and Member States. Its purpose is to support the end users in cybersecurity situational awareness. Information sources (web sites) are indexed using a specialized tool (Elastic Search) and also by using a knowledge graph edited by ENISA specialists. Then it is served as response to queries in a google-like interface. Only information related to cybersecurity is used and indexed.</p> <p>User account information is explicitly used to manage the users of the platform. No log data or such queries are kept - only basic account info. For purposes of cost management, we log for 30 days a history of user search queries.</p>
Description of data subjects	<p>Users of the platform: Blueprint stakeholders from EU Institutions and Member States (as described in the EC recommendation C(2017) 6100 final, 13/9/2017).</p> <p>Web users, whose public posts (related to cybersecurity) are indexed by the OpenCSAM search engine.</p>
Description of data categories	<p>OpenCSAM performs indexing of specific public web sites and presents information on the basis of search queries to registered users. Information sources used are all relevant to cybersecurity. Information sources include the Twitter and Shodan public databases (from relevant APIs and under specific licensing agreements between ENISA and the service providers). They also include specific web sites from the web and the dark web.</p> <p>The following personal data are processed:</p> <ol style="list-style-type: none"> 1) For the general indexing, ENISA only indexes the content of publicly available websites. Cached (scraped) pages are stored locally at ENISA in order to allow for better usability (e.g. in case of technical problems of the original websites or to facilitate use of the web content by the OpenCSAM users). Such pages may also include personal data (however, ENISA is not responsible for the content). 2) Specifically for the Twitter database, ENISA obtains access to personal data published in public Twitter posts directly through the Twitter API. In the case of Shodan, ENISA's access to the database is only limited to aggregated information (no IP addresses are stored). 3) On top of personal data processing via the OpenCSAM indexing and search engine, user account information is also processed (name, email, organisation,



	account creation date, last login). - Twitter queries are stored for 30 days for cost management.
Time limits (for the erasure of data)	<p>For the users of the platform, personal data will be kept up for as long as the users are active OpenCSAM users (user account information). Users can notify ENISA at opencsam@enisa.europa.eu if they would like to de-register from the tool. Then all related personal information is deleted. All the data are kept in the databases stored on the ENISA servers.</p> <p>Regarding the indexing of the data, the data is erased when the administrator deletes it from the repository. Twitter API data is deleted after 30 days or after Twitter sends a request for deletion. User search history is kept only for twitter API requests and only for 30 days. Afterwards it is automatically deleted.</p>
Data recipients	<p>Designated staff involved in the data processing operation, namely:</p> <p>OpenCSAM users - security analysts known and validated by ENISA (platform is only accessible to registered users). Access to Twitter and Shodan APIs so as the access to user account information is restricted only to the ENISA system administrators.</p> <p>EU bodies charged with monitoring or inspection tasks in application of EU law (e.g. internal audits, European Anti-fraud Office – OLAF).</p>
Transfers to third countries	<p>N/A</p> <p>OpenCSAM is hosted at ENISA's datacenter. All related data are stored within the virtual machine(s) that consist the application.</p>
Security measures - General description	<p>Application level: Support contract with external contractor for patching, updating and monitoring.</p> <p>Infrastructure (up to OS level): Security measures performed by ENISA IT Staff as per ENISA IT policies.</p>
Privacy statement	Privacy statement available on ENISA's intranet and for OpenCSAM users.

