

# ELECTRONIC SIGNATURES IN DOCUMENTS

Record of processing activity	
Title	Electronic signatures in documents
Name and contact details of controller	ENISA, Corporate Support Services Unit, FIN, <a href="mailto:procurement@enisa.europa.eu">procurement@enisa.europa.eu</a>
Name and contact details of DPO	<a href="mailto:dataprotection@enisa.europa.eu">dataprotection@enisa.europa.eu</a>
Name and contact details of Joint Controller	N/A
Name and contact details of processor	<p>Adobe Ireland for the provision of the Adobe Sign service, <a href="https://acrobat.adobe.com/gr/en/sign.html">https://acrobat.adobe.com/gr/en/sign.html</a>. The service has been obtained by ENISA via the EC DG DIGIT SIDE II Framework Contract.</p> <p>Note that the EU-Sign service is also provided by the European Commission under a specific SLA with ENISA. Authentication to this service is performed via the EC EU-login service (ECAS account) - the European Commission acts as controller for the provision of EU-login. The description of this processing activity will be covered by a separate record.</p>
Purpose of the processing	Support electronic transactions with third parties or internally at ENISA, by facilitating the electronic signing of documents. The Adobe sign service is used especially in the area of procurement and contract management and when the European Commission's EU-Sign service cannot be used by external parties.
Description of data subjects	ENISA staff and third parties that are entering into contractual or other type of agreements with ENISA.
Description of data categories	<p>For the Adobe-Sign service:</p> <p>a) Information embedded within a document, collected via form fields or other information regarding the signer's access and use of the electronic signature service, such as the date and time of a signature or transaction event, IP address and other information about the browser or device used to send, sign, delegate, approve or take other actions with respect to the document. Additional identification features (optional): photo, document upload.</p> <p>b) Information collected from processor only (Adobe) about "how senders and signers use and access features and capabilities of the electronic signature service" with the purpose to "operate, improve and personalise the electronic signature service".</p> <p><a href="https://www.adobe.com/gr_en/privacy/policies-business/esign.html">https://www.adobe.com/gr_en/privacy/policies-business/esign.html</a></p>
Time limits (for the erasure of data)	<p>As per ENISA's applicable financial rules (Article 47) and for audit purposes, files relating to financial transactions are to be retained in the archives for a period of 5 years following the discharge of the financial exercise. The discharge of the financial exercise is generally signified 2 years after the financial year, for a total of minimum 7 years for holding the personal data.</p> <p>For the Adobe-Sign service: Further clarifications to be provided on retention periods of processor for information collected directly by them upon the use of the service.</p>
Data recipients	<p>For the Adobe Sign service:</p> <p>Designated ENISA staff involved in procurement and contract management;</p>



	Staff of the processor (Adobe Ireland), as well as its affiliates (Adobe Inc.) and its sub-processors in US and other third countries ( <a href="https://www.adobe.com/gr_en/privacy/sub-processors.html">https://www.adobe.com/gr_en/privacy/sub-processors.html</a> ).
Transfers to third countries	The Adobe Sign service includes transfers to Adobe data centres in US, as well as to its sub-processors in US and other third countries. The transfers are based on the EC SCCs, as incorporated in the Adobe data processing agreement.  Further information on transfers performed by Adobe: <a href="https://www.adobe.com/gr_en/privacy/eudatatransfers.html">https://www.adobe.com/gr_en/privacy/eudatatransfers.html</a>
Security measures - General description	Security measures, as provided by the processor (Adobe) and included in its privacy policy and data processing agreement.
Privacy statement	To be provided soon.

