

Nr.	Item	Security Logging and Auditing
1	Name of the Controller	Head of Resources Department: infosec@esma.europa.eu
1.1	Address of the Controller	ESMA: 201-203 rue de Bercy 75012 - Paris
1.2	ESMA Parts Entrusted with Processing	ESMA/RES/Information Security
1.3	Processors (If any)	Security Awareness and Training, when served online, is delivered through the Learning Management Service offered by KnowBe4, this last acting as a data processor.
2	Name and contact details of DPO	ESMA's Data Protection Officer (DPO): dpo@esma.europa.eu
3	Name and contact details of joint controller (where applicable)	Not applicable
4	Name and contact details of processor (where applicable)	When served online: KnowBe4 - 33 N Garden Ave Ste 1200, 33755, Clearwater (FL), United States of America.
5	Purpose of the processing	Deliver up-to-date Security Awareness training and meet the International information security standard ISO/IEC 27001: all employees of the organisation shall receive appropriate awareness training and regular updates in organisational policies and procedures, as relevant for their job function.
6	Description of categories of persons whose data ESMA processes and list of data categories	ESMA's staff, SNEs and trainees. The following professional personal data is gathered to deliver the service: electronic mail and department name. User's learning progress will be measured, reported and followed-up to comply with ESMA's security control objectives and the information security standard ISO/IEC 27001.
7	Time limit for keeping the data	User's personal data is updated on yearly basis and upon delivering each Security Awareness training campaign. User's learning progress, and related user activity data, is kept for 24 months for audit and compliance purposes; this period will persist, and it is applicable during a temporary, permanent or after the termination of the employee's relationship with ESMA. The retention period was set to meet ESMA's compliance control objectives and the ISO/IEC 27001 International information security standard. Users' learning performance records are required to show that appropriate learning resources have been made available to the intended audience on relevant ESMA's Security policies, procedures and other relevant security subjects.
8	Recipients of the data	ESMA's Information Security Officer, ESMA's Security Committee, ESMA's Management, Senior Management and the Executive Director. ESMA's Staff designated on ad-hoc basis by The Data Controller with a valid need-to-know.
9	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	Yes, the electronic mail and the department name will be transferred to KnowBe4 in the USA. European Commission Standard Contractual Clauses (SCCs) are in place as an adequate safeguard.
10	General description of security measures, where possible.	ESMA applies security controls according to ESMA's security policies, procedures and controls which are notably aligned with the ISO/IEC 27001 International Standard. KnowBe4 is SSAE18 SOC2 compliant and claim to have certified personnel in European Data Protection Regulation (CIPP/E). Additional security controls such as data encryption of data in transit and at rest, the use of a compliant Cloud Service Providers SOC3, and other security measures can be found here: https://www.knowbe4.com/security .
11	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	<p>DATA PRIVACY NOTICE</p> <p>In order to meet industry acceptable security standards, and to enhance ESMA's security posture, there is a need to collect ESMA's professional emails to leverage convenient and flexible security awareness training sessions, targeting ESMA Staff, Seconded National Experts and ESMA's trainees.</p> <ul style="list-style-type: none"> • As a general principle, ESMA only processes personal data for the performance of tasks carried out in the public interest on the basis of the Treaty on the Functioning of the European Union, on the basis of the relevant legislation or in the legitimate exercise of official authority vested in ESMA or in a third party to whom the data are disclosed. • ESMA has the right to analyse and report logged data in order to meet security compliance obligations. • ESMA processes personal data in line with Regulation (EU) 2018/1725 and Decision ESMA/AD-133-716. For more information, please see ESMA's Data Protection Statement on https://www.esma.europa.eu/data-protection. <p>a) You are entitled to access your information relating to your personal data processed by ESMA, verify its accuracy and, if necessary, correct it in case the data is inaccurate or incomplete.</p> <p>b) You have the right to request the erasure of your personal data, if your personal data is no longer needed for the purposes of the processing, if you withdraw your consent or if the processing operation is unlawful.</p> <p>c) You can ask the Data Controller to restrict the personal data processing, under certain circumstances, such as if you contest the accuracy of the processed personal data or if you are not sure if your personal data is lawfully processed.</p> <p>d) You may also object, on compelling legitimate grounds, to the processing of your personal data.</p> <p>e) Additionally, you may have the right to data portability which allows you to make a request to obtain the personal data that the Data Controller holds on you and to transfer it from one Data Controller to another, where technically possible.</p> <p>You may exercise your rights by contacting the Data Controller at infosec@esma.europa.eu</p> <p>In some cases your rights might be restricted in accordance with Article 25 of the Regulation (EU) 2018/1725. In each case, ESMA will assess whether the restriction is appropriate. The restriction should be necessary and provided by law, and will continue only for as long as the reason for the restriction continues to exist. If you have additional questions or concerns you can also contact ESMA's DPO at DPO@esma.europa.eu You have the right to lodge a complaint with the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under the Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by ESMA.</p> <p>In case of queries please consult ESMA's Data Protection Officer (DPO@esma.europa.eu). You may also contact the European Data Protection Supervisor (edps@edps.europa.eu).</p> <p>For more information please refer to: https://www.esma.europa.eu/about-esma/data-protection</p>