

# EGI Workload Manager Service

## Privacy Notice

Version 1.1, April 15, 2022

|   |   |
|---|---|
| <b>Name of the service</b>                    | EGI Workload Manager  |
| <b>Description of the service</b>             | <p>The EGI Workload Manager service (hereinafter referred to as: “the service” or “Workload Manager”) enables the management and distribution of computing tasks across the resources of the EGI Federation.</p> <p>This privacy notice describes how we, EGI Foundation (hereinafter referred to as "we" or "the Data Controller"), collect and process data by which you can be personally identified (“Personal Data”) when you use the service.</p> |
| <b>Data controller</b>                        | EGI Foundation<br>Science Park 140<br>1098 XG Amsterdam<br>Netherlands  |
| <b>Data protection officer</b>                | EGI Foundation<br>Data Protection Officer<br>Science Park 140<br>1098 XG Amsterdam<br>Netherlands<br>E-mail: <a href="mailto:dpo@egi.eu">dpo@egi.eu</a>   |
| <b>Jurisdiction and supervisory authority</b> | <p>Jurisdiction: NL, Netherlands</p> <p>EGI Foundation's lead supervisory authority is the Dutch Data Protection Authority. They can be contacted at <a href="https://autoriteitpersoonsgegevens.nl/en/contact-dutch-dpa/contact-us">https://autoriteitpersoonsgegevens.nl/en/contact-dutch-dpa/contact-us</a></p>  |
| <b>Personal data processed</b>                | <p>In addition to any personal data incorporated in jobs managed by end users and submitted to the Workload Manager, the following categories of personal data are processed by EGI Foundation as part of providing the services:</p> <p><b>Identification data:</b></p> <ul style="list-style-type: none"><li>• Name</li><li>• Identification numbers (as provided by identity providers)</li><li>• E-mail address</li></ul>                           |

|  |   |
|--|---|
|  | <ul style="list-style-type: none"> <li>● Affiliation</li> <li>● IP address</li> </ul> <p><b>Behavioural data:</b></p> <ul style="list-style-type: none"> <li>● Usage data</li> <li>● Technical logs with timestamps</li> </ul> <p><b>Data allowing conclusions on the personality:</b></p> <ul style="list-style-type: none"> <li>● Membership information on roles, groups and communities</li> </ul>  |
| <p><b>Purpose of the processing of personal data</b></p>       | <p>The purpose of the collection, processing and use of the personal data mentioned above is:</p> <ul style="list-style-type: none"> <li>● To provide the service functions, i.e. allowing users to manage their computing workload on the resources they can access, conserving the history of their submissions and allowing administrators to manage the service and the user groups.</li> <li>● Identify the users or the administrators accessing the service and track usage of resources for accounting and security management.</li> </ul>  |
| <p><b>Legal basis</b></p>                                      | <p>The legal basis for processing personal data is: Legitimate interests pursued by the controller or by a third party according to Art. 6 (1) (f) GDPR.</p>  |
| <p><b>Third parties to whom personal data is disclosed</b></p> | <p>Personal data will not be used beyond the original purpose of their acquisition. If a forwarding to third parties should be necessary to answer an inquiry or to carry out a service, the approval of the data subject is considered to have been given by entering in a contract when using the respective function or service. In particular, the data you provide to us will not be used for advertising purposes.</p> <p>For the purpose given in this privacy policy, personal data may be passed to the following third parties:</p> <p><b>Within the EU / EEA:</b></p> <ul style="list-style-type: none"> <li>● Workload Manager administrators group (resource provider, service administrator, sub-contracted data processor) including CNRS/IN2P3 and potentially CNRS/CPPM members, as well as other selected CNRS members for user support purposes</li> <li>● Suppliers supporting you or your community with the provision of computing and storage resources, according to the agreement with you or your community. A comprehensive list of providers contributing to the federation's resources can be found at <a href="https://www.egi.eu/federation/data-centres/">https://www.egi.eu/federation/data-centres/</a></li> <li>● The records of your use and technical log files produced by the Service components may be shared, via secured mechanisms, for security incident response purposes with other authorised participants in the academic and research distributed digital infrastructures authorised by EGI Foundation governance, only</li> </ul> |

|                           |  |
|---------------------------|--|
|                           | <p>for the same purposes and only as far as necessary to provide the incident response capability where doing so is likely to assist in the investigation of suspected misuse of Infrastructure resources.</p> <p><b>Outside the EU / EEA:</b></p> <ul style="list-style-type: none"> <li>• Suppliers supporting you or your community with the provision of computing and storage resources, according to the agreement with you or your community. A comprehensive list of providers contributing to the federation's resources can be found at <a href="https://www.egi.eu/federation/data-centres/">https://www.egi.eu/federation/data-centres/</a></li> </ul> <p>Any data transfer to a third country outside the EU or the EEA only takes place under the conditions contained in Chapter V of the GDPR and in compliance with the provisions of this privacy policy and any related policies adopted by the EGI Federation.</p>   |
| <p><b>Your rights</b></p> | <p>You can exercise the following rights at any time by contacting our data protection officer using the contact details provided in the Data Protection Officer section:</p> <ul style="list-style-type: none"> <li>• Information about your data stored with us and their processing</li> <li>• Correction of incorrect personal data</li> <li>• Deletion of your data stored by us</li> <li>• Restriction of data processing, if we are not yet allowed to delete your data due to legal obligations</li> <li>• Objection to the processing of your data by us</li> <li>• Data portability</li> </ul> <p>To access your profile information, you can go to your Check-in user profile page.</p> <p>To access and rectify the data released by your home organisation (e.g. your university, research institute or any other identity provider), you should contact them.</p> <p>You can complain at any time to the supervisory data protection authority (DPA) responsible for you. The responsible DPA depends on your country and state of residence, of your workplace or of the presumed violation. A list of the supervisory authorities with addresses can be found at <a href="https://edpb.europa.eu/about-edpb/board/members_en">https://edpb.europa.eu/about-edpb/board/members_en</a>.</p> <p>You can contact EGI Foundation's lead supervising authority using the contact details provided in the Jurisdiction and Supervisory Authority section.</p> |

|                                    |   |
|------------------------------------|---|
| <b>Data retention and deletion</b> | <p>Your personal data associated with your account, including the history of your submissions, is kept as long as your account is active. Your account can be deactivated on request.</p> <p>The technical log files produced by the service components will be deleted or anonymised after, at most, 18 months.</p>  |
| <b>Security</b>                    | <p>We take appropriate technical and organisational measures to ensure data security and the protection against accidental or unlawful destruction, accidental loss, alteration, unauthorised disclosure or access.</p> <p>A comprehensive overview of the technical and organisational measures taken by EGI Foundation can be downloaded from <a href="#">EGI Documentation Database</a>.</p> |
| <b>Additional Policies</b>         | <p>EGI Foundation is conforming to GEANT Code of Conduct and your personal data will be processed in accordance with the <a href="#">Code of Conduct for Service Providers</a> and the <a href="#">EGI-doc-2732-v3: Policy on the Processing of Personal Data</a>.</p>  |
|                                    | <p>Based on <a href="#">AARC Policy development kit</a> (licenced under <a href="#">CC BY-NC-SA 4.0</a>)</p>  |