

PRIVACY NOTICE – Access to Wi-Fi Guest network (record reference number: 22)

Access to Wi-Fi Guest network involves processing of personal data, which shall comply with Regulation (EU) N° 2018/1725¹ (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 to give a temporary access (=expiring account) to the visitors of the SESAR JU to the internet by using the Wi-Fi Guest network of the SESAR JU and to increase the level of security on the SESAR JU network. The automatically gathered data are used in order to protect the security and integrity of the SESAR JU network. Identification is needed for the strict purpose of prevention of possible abusive conducts (e.g. visit of prohibited websites, possible hacking).

Which personal data do we process?

- Name, generic user ids and dynamic IP addresses
- Media Access Control (MAC) address of the device connected, URL of visited websites

Under what legal basis do we process your personal data?

- Public Interest article 5(1)(a) of Regulation 2018/1725
- Explicit consent article 5(1)(d) 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?

Ucopia is a layer that enables visitors to connect to the guest WiFi network of the SESAR JU, which is disconnected from the rest of the SESAR JU network. Ucopia will be used to grant access to the WIFI_Guest network only.

The collection of data is partially manual and partially automated. Connection to Ucopia is only available from the internal network of the SESAR JU, at the SESAR JU premises.

1. Manual processing

¹ 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”).

1.1. Temporary users

The SESAR JU Reception, and the ICT Support team as backup, generates a temporary user's account on the guest-WiFi network, using the Ucopia solution. No personal data collection.

1.2. Frequent users

Collection of personal data is only required in certain cases, namely while setting up accounts for certain frequent visitors. The name and surname of regular visitors who wish to maintain access to the guest-Wi-Fi account for future visits, will be kept for as long as the account is active.

1.3. Prevention of abusive conducts

A user can be potentially identified by linking separate data elements such as the MAC address of the device used by the visitor and the username used to connect to the guest-Wi-Fi facility. This operation has to be done manually, only in case of alert related to a security threat. The automatically collected data elements do not allow to identify the user automatically if they are taken separately.

We use a registration and access log to know the number of visitors connecting to the Wifi Guest network and we identify the devices connected to it. That way, we are able to identify misconducting activities performed on the SESAR JU environment and to investigate incidents in a more efficient way.

2. Automatic processing

The collection of data is made by keeping a record of the MAC address of the electronic device used to connect to the guest-Wi-Fi network and the URL's of the websites that were visited during the wifi-session.

All data automatically collected are automatically deleted (from SESAR JU server hosted at Eurocontrol).

Ucopia solution provides for four different types of access depending on the level of authorisation, accordingly:

- 1) **Administrator:** Responsible to supporting the application and managing overall application permissions and maintenance activities; Administrators have access to application's log. (ATOS)
- 2) **Local Administrator:** Responsible to manage the local access rights and can create visitor accounts, Local Administrators have access to application's log. (ATOS)
- 3) **Registrors:** Can create visitor accounts, registrors do not have access to application's log (SESAR JU reception-Receptel)
- 4) **Visitors (Users-data subjects):** Registering in the application to get access to the Wifi Guest network and the Internet, they do not have access to the application's log

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

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

The following might have access to your personal data:

- Administrators and Local Administrators of the application and Registrors, meaning on-site contractors or contractors from the SESAR JU hosting supplier (EUROCONTROL)

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.

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. 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, and SJU DPO 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?

- The collected personal data is retained from the moment when the user account is created until a maximum of 15 days after the deactivation of the user account. Upon deactivation of the account, data, which linked could become personal data, are automatically deleted.

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, and
- the responsible team at 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 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](#). The user has to formally approve the terms of data collection before being authorized to use the service and a link to a privacy notice is provided. The SESAR JU privacy notice relating to this processing activity is also available in the [SJU website](#).