

F4E Document**Privacy Notice for ServiceNow**

Privacy Notice for ServiceNow

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v1.0	Signed	27 June 2025	
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PRIVACY NOTICE ON PERSONAL DATA PROTECTION REGARDING Data Collection in ServiceNow

The objective of this Notice is to inform you about the collection and processing of your personal data in line with the applicable Data Protection Regulation (EU) 2018/1725¹.

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1. Why does F4E process your personal data? Whose data is processed?

The data processing concerns the data of the F4E users (F4E Staff, trainees, interims, SNEs, ESPs and other external collaborators with F4E user account) who will be allowed to use the ServiceNow platform hosted in the Cloud.

The purpose of this procedure is to define how F4E collects, processes, stores and protects personal data when using the ServiceNow platform. This privacy notice ensures compliance with applicable data protection and regulations, including the EUDPR and outlines the responsibilities and safeguards in place to protect the privacy rights of individual whose data is processed through ServiceNow.

The level of access will depend on the specific permissions granted to the user.

2. What is the justification for the processing?

The processing of personal data is necessary for the **performance of F4E tasks** on the basis of the F4E founding instrument and/or other legal instrument adopted on the basis thereof or for compliance with a specific legal obligation F4E is subject to.

It is based on:

Council Decision of 27 March 2007 "establishing the European Joint Undertaking for ITER and the Development of Fusion Energy and conferring advantages upon it" - 2007/198/Euratom, as last amended by Council Decision of 10 February 2015 (2015/224 Euratom), O.J. L 37, 13.2.2015, p.8, in particular Article 6 thereof;

Statutes annexed to the Council Decision (Euratom) No 198/2007 “establishing the European Joint Undertaking for ITER and the Development of Fusion Energy and conferring advantages upon it”, as last amended on 22 February 2021, in particular Article 10 thereof;

The legal basis for processing the information is grounded in Art.5 EUDPR, which outlines the principles of lawful processing.

Specifically, it includes:

- Lawfulness, fairness and transparency: Processing must be done lawfully, fairly and in a transparent manner.
- Purpose limitation: Data must be collected for specified, explicit, and legitimate purposes.
- Data minimization: Only the data necessary for the intended purpose should be collected.
- Accuracy: Ensuring that the data is accurate and kept up to date.
- Storage limitation: Data should not be kept longer than necessary for the purposes for which it is processed.
- Integrity and confidentiality: Data must be processed securely to protect against unauthorized access or damage.
- Accountability: The data controller must be able to demonstrate compliance with these principles.

These principles ensure that the processing of personal details conducted responsibly and ethically.

3. Which data is F4E processing?

F4E will process the following general personal data:

- Name and surname
- Corporate email address
- Username
- Location (country, city, building, office)
- Phone number

For this project it is not necessary to process sensitive information.

4. Who has access to your data?

The following people have access to your personal data:

- DT Unit members, including ServiceNow administrator and technicians who need to work with the tool to be able to provide service to F4E

users.

- Staff from ServiceNow based in EU supporting DT Unit on platform maintenance and evolution

The processing of this data is justified under the legitimate interest basis (Article 6.1, EUDPR) as it is essential for the fulfilment of F4E's responsibilities.

Also, only if appropriate and necessary, for monitoring or inspection tasks, access may be granted to:

- Director of F4E
- Head of Administration Department
- Head of the Legal Service Unit, and/or responsible Legal Officer
- F4E Data Protection Officer and Anti-Fraud & Ethics Officer
- IAC / IAS / IDOC / ECA

F4E processes your personal data through ServiceNow, therefore, your data may also be accessible to ServiceNow staff providing technical and platform support.

ServiceNow acts strictly as a data processor on behalf of F4E. As Controller F4E ensures that the Processor applies the necessary safeguards to process your data safely and in accordance with Regulation (EU) 2018/1725.

[Website and Events Privacy Statement - ServiceNow](#)

5. How long does F4E store your data?

The retention period for the collected data will be 2 years after closure of the user account.

6. Does F4E intend to transfer my data to third countries or International Organizations?

F4E does not intend to transfer your personal data to any third countries or international organizations.

7. What are your rights in relation to your data and how can you exercise them?

You have the right to access your personal data, to correct any inaccurate or incomplete data, to request restriction or erasure, or to object to the processing, pursuant to Articles 14(3) and 17-23 of Regulation (EU) 2018/1725.

Legal basis for processing. Your personal data is processed on the basis of contractual necessity, meaning it is required to fulfil the obligations arising from the agreement between you and the company. As such, the processing is not based on consent, and withdrawal of consent does not apply.

However, If you object to the processing or terminate the contractual relationship, the company will assess whether it is still necessary to retain your data for legal or operational reasons, in accordance with applicable data protection laws.

Any request to exercise one of those rights should be directed to the Controller (lacopo.lanniello@f4e.europa.eu). Where you wish to exercise your rights in the context of one or several specific processing operations or files, please provide their description and reference(s) in your request.

Exceptions based on Article 25 of Regulation (EU) 2018/1725 may apply [See Governing Board Decision of 9 December 2019²]. In that case, the data subject shall be informed of the principal reasons for applying such restrictions.

8. Contact details of the Data Protection Officer

You may contact the Data Protection Officer (DPO) of F4E (DataProtectionOfficer@f4e.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

9. Right to lodge a complaint

You have the right to lodge a complaint to the European Data Protection Supervisor (EDPS@edps.europa.eu), if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by F4E.

06/2025

¹ Regulation (EU) 2018/1725 of 23 October 2018 “on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data”. O.J 21.11.2018, L295/39.
This Privacy Notice is in line with Article 14 and 15 of that Regulation (Principle of Transparency).

² [O.J., 10.02.2020, L 37/18.](#)