

Data Protection Notice on Financial Transactions (ABAC)

1. Introduction

Personal data processed in relation to internal financial transactions are subject to [Regulation \(EU\) 2018/1725 of the European Parliament and of the Council 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](#) (or Regulation (EU) 2018/1725)¹.

The Head of the Resources Unit is the staff member responsible for this processing operation on behalf of the data controller (i.e. Eurofound).

The European Commission (namely DG BUDG² and DG DIGIT³) is a joint controller. Contact details of the Commission's DPO can be found [here](#).

2. Why do we process your personal data?

The purpose of processing is to provide treasury services and general accounting services, including in particular the:

- bank execution of all payments;
- cash management;
- reconciliation of payments;
- follow-up of exceptions related to payment execution;
- reception of receipts;
- control of cost and revenue;
- management of relationship with bank;
- treasury related risk management; and

¹ OJ L 295 21.11.2018, p. 39-98.

² Manages ABAC, the financial and accounting application set up by the Commission to monitor the execution of its budget and to prepare its accounts. A description of the various modules and the supported functionalities can be found [here](#).

³ Implements and maintains ABAC.

- registering legal entities and bank accounts.

3. What is the legal basis for processing your personal data?

The processing of personal data is necessary:

- for the performance of a task carried out in the public interest⁴;
- to comply with legal obligations Eurofound is subject⁵; and
- for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract⁶.

4. Which personal data do we collect and process?

The following personal data is processed:

- The information you have filled in the Legal Entity Form as well as supporting documents you have provided (e.g. name, ID document, postal address, phone number, place and date of birth);
- The information you have filled in the Financial Identification Form (e.g. IBAN, BIC, VAT number) as well as the supporting documents you have provided (i.e. bank statement); and
- Personnel number.

All data are kept centrally in the ABAC system until the Legal Entity and Bank is validated and then the documents can no longer be consulted. The Finance assistants keep a paper copy in a file for 10 years or in a confidential folder in electronic form in the filing system.

5. Who has access to your personal data and to whom is it disclosed?

The following recipients may have access to your personal data:

- All members of the Finance team, incl. the Accounting Officer;
- Other authorised ABAC users can only see limited information;

⁴ Article 5(1) (a) of Regulation (Eu) 2018/1725.

⁵ Article 5(1) (b) of Regulation (EU) 2018/1725.

⁶ Article 5(1) (c) of Regulation (EU) 2018/1725.



- Heads of Units concerned by the financial procedure; and
- The European Commission ABAC system's operators and internal and external auditors;

6. How long do we keep your personal data?

The following retention periods apply:

- 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 2 years after the financial year) therefore for a total of 7 years;
- Copies of Financial ID forms, Legal Entity forms, Identity cards, passports, VAT documents, company registration documents and other support documents are retained by Eurofound for 10 years; and
- Related files are also kept until the end of a possible audit if one started before the end of the above period.

7. How do we protect and safeguard your data?

Only the minimal set of personal data required for sound financial management is registered in ABAC. Access to ABAC requires an authentication based upon a UserID/password combination. Visibility of data is protected by segregation: the user can only access information within the scope of each responsibility entrusted to him. Furthermore, particular provisions are implemented to manage access rights to personal data held in the legal entity and bank account file.

8. Do we transfer any of your personal data to third countries or international organisations (outside the EU/EEA)?

No.

9. Does this processing involve automated decision-making, including profiling?

No decision is taken by Eurofound in the context of this processing activity solely on the basis of an automated processing of your personal data (i.e. processing without human intervention).



10. What are your rights as a data subject and how can you exercise them?

Within the limits set by Regulation (EU) 2018/1725, you have the right to access, rectify, erase and/or port your personal data, as well as to restrict or object to the processing of your personal data.

In order to exercise your rights, please contact the Head of the Resources Unit (Markus.Grimmeisen@eurofound.europa.eu) whereby you shall specify your claim (i.e. the right(s) you wish to exercise). The exercise of your rights is free of charge. If your request is manifestly unfounded or excessive, Eurofound may refuse to act on it.

11. Right to recourse

Should you feel that the processing infringes the data protection rules, you are entitled to raise a [complaint with the European Data Protection Supervisor](#).

12. Who shall I contact in case of doubts?

Should you have any question or doubt on this processing operation, you should contact the Head of the Resources Unit (markus.grimmeisen@eurofound.europa.eu).

You may always submit queries, remarks or complaints relating to the processing of your personal data to Eurofound's Data Protection Officer (dataprotectionofficer@eurofound.europa.eu).