

Eurojust record of processing activity

Record of processing personal data activity, based on Article 31 of Regulation (EU) 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

Nr.	Item	Description	
FINA	INANCIAL TRANSACTIONS		
1.	Last update of this record	16 December 2020	
2.	Reference number [For tracking, please contact the DP Office for obtaining a reference number.]	BFPU-03.02 (January 2021)	
3.	Name and contact details of controller [Use functional mailboxes, not personal ones, as far as possible - this saves time when updating records and contributes to business continuity.]	at <u>hobfpconfidential@eurojust.europa.eu</u>	
4.	Name and contact details of DPO	dpo@eurojust.europa.eu	
5.	Name and contact details of joint controller (where applicable)	For ABAC – European Commission DG Budget is responsible for the development and maintenance of ABAC. Any information related to processing of personal data in ABAC is detailed in the register of the Data Protection Officer of the Commission.	
	[If you are jointly responsible with another EUI or another organisation, please indicate so here (e.g. two EUIs with shared medical service). If this is the case, make sure to mention in the description who is in charge of what and whom people can address for their queries.]		

Part I – Article 31 Record (this part is publicly available)

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6.	Name and contact details of processor (where applicable) [If you use a processor (contractor) to process personal data on your behalf, please indicate so (e.g. 360° evaluations, outsourced IT services or pre-employment medical checks).]	BFP's Missions Sector staff (Mission Officer (MO), Budget Support Officer (BSO) and Budget Officer (BO) roles)
7.	Purpose of the processing [Very concise description of what you intend to achieve; if you do this on a specific legal basis, mention it as well (e.g. staff regulations for selection procedures).]	 The purpose of this process is to implement the budget of Eurojust and to comply with legal obligations: College Decisions (e.g. on the Financial Regulation applicable to Eurojust), Administrative Director Decisions, Eurojust Decisions and Policies. All financial transactions are processed in ABAC, the financial and accounting tool set up by the Commission and used by Eurojust to monitor the execution of its budget and to prepare its accounts. For details, please consult <u>here</u> the relevant EC ABAC Data Protection Record. Due to the inclusion in the SUMMA pilot, supporting documents for financial transactions related to the
		 documents for financial transactions related to the Budget Year 2021 onwards will be stored in PRICE (Purchasing Records for Invoices and Commitments of Eurojust, <u>https://www.eurojust.europa.eu/rd-01-price-sharepoint-site-storing-documents-be-linked-abac</u>). At Eurojust, the decision on financial circuits and segregation of duties at Eurojust is established based on Eurojust Financial Regulation and the Internal Control Standards. This decision is made by the Administrative Director and provides a description of the financial workflows as well as the nature of expenditures adhering to such workflows.
		Prior to Eurojust entering any financial and contractual transaction, a unique identification and registration of the beneficiary's identity (named Legal Entity) and the beneficiary's bank account details (named Bank Account) are required. The establishment of the unique identity is managed by the Central Validation Team of DG BUDG. For details, please consult the relevant DG BUDG Records on the validation of <u>Legal Entities</u> and <u>Bank Accounts</u> . The financial transactions processed by Eurojust are: - Budgetary commitments: transactions by which

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		Eurojust earmarks funds to cover one or more future expenses. Each commitment is approved based on supporting documents associated with the transaction.
		- Legal Commitments: following the approval of the budgetary commitment, a legal commitment might be signed by the authorizing officer or grant agreement with a third party.
		- Registration of invoices received from suppliers: transactions in which Eurojust registers financial details of each supplier that will be processed for payment.
		- Payments: operations that release Eurojust from an obligation to a creditor. A payment consists of transferring a financial amount to Eurojust stakeholder. The payment is processed in line with the financial circuits of a unit executing the activity related to the invoice Transfers between budget lines: budget transfers occur when, in the course of a financial year, appropriations are transferred from one budget line to another,
		- Recovery orders: recovery orders occur, when at the end of the activity its shown that there is a debt towards Eurojust, therefore the money need to be recovered.
		- Settlement of mission expenses – an operation which consists in the verification of eligibility of expenses and its validation for payment.
8.	Description of categories of persons whose data are processed and list of data categories [In case data categories differ between different categories of persons, please explain as well.]	We process personal data for the following categories of persons:
		- Eurojust post holders (Staff, College members, Seconded National Experts, Interims and Interns)
		- External suppliers: individuals having signed a contract/purchase order with Eurojust
		- Grant Beneficiaries
		- Externals who attend Eurojust/EuroMed Justice Programme meetings as well as Selection Board Members and Recruitment candidates.
		In this respect, the data processed by BFP may request the following personal data:
		a) Identification data: name, surname, business title, date and place of birth where necessary, a copy of an identification document;
		b) Contact details: postal address, name of the

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		organization, country of residence, telephone number, email address;
		c) Financial information: bank account details (IBAN and SWIFT codes), VAT numbers, name, surname and postal address of account holder, bank certificates;
		d) Signature or e-Signature;
		e) Information and documents submitted justifying the reimbursement (flight and rail bookings, travel documents, accommodation invoices, tickets, invoices related to the reimbursement, etc.);
9.	Time limit for keeping the data	The data processed is stored in several ways:
	[Indicate your administrative retention period including its starting point; differentiate between categories of persons or data where needed (e.g. in selection procedures: candidates who	The data related to financial transactions, other than those related to missions and travel reimbursements is electronically archived in ABAC and PRICE and is retained according to the Commission's (ABAC) and Eurojust's (PRICE) data retention policies
	made it onto the reserve list vs. those who did not).]	The financial transactions data related to missions and travel reimbursements:
		 processed in eMissions is electronically archived on the system. Additionally, paper files are archived in the General Archive of Eurojust.
		 processed in EJ-MAP, the new generation of Eurojust IT tool for missions planning, approval and reimbursement, is electronically archived in the tool. A separate record of processing activities is available for EJ_MAP.
		The EJ-MAP pilot commenced in Q3 2020. eMissions will be phased out in Q1 2021.
		All types of data related to financial transactions (both paper and electronic files) is retained for a period of 5 years, complying with the EU Financial Regulation. In addition, a 2-year retention period is followed at Eurojust, which starts running from the 31 st December of the budget year associated to the transaction. More concretely, for every transaction, there is a 2 years period before the discharge of the annual accounts after which the documents are retained for 5 years as per Financial Regulation.
		Automatic deletion, following the retention period is implemented in EJ-MAP.
10.	Recipients of the data [Who will have access to the data within Eurojust? Who outside Eurojust	-All ABAC users (Workflow/ Datawarehouse) with an authorised license in accordance with access entitlements.
	will have access? Note: no need to mention entities that may have access	- Hierarchical Superiors/Line Managers

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	in the course of a particular investigation (e.g. OLAF, EO, EDPS).]	-Information Management Unit – Application Management
		- Other delegated/authorised Post-holders of Eurojust
11.	 Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards? [E.g. processor in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty. If needed, consult DPO for more information on how to ensure safeguards.] 	There are occasional transfers of personal data to third countries and/or international organisations (e.g payments for reimbursing travel expenses incurred by external participants who attend events organized by Eurojust). This is necessary to facilitate a payment or recovery by bank transfer. The information used to carry out these payments is provided directly by the beneficiaries and/or
		authorised person(s). The actual payment is made via ABAC, however, the data provided by the beneficiary is extracted from the system.
		In line with the College and Recruitment Policies on reimbursements of travel costs both for external and recruitment candidates, payments can be made to any third countries or organisations within the EU or outside.
12.	General description of security measures, where possible. [Include a general description of your security measures that you could also provide to the public.]	All IT applications at Eurojust are developed according to a standard set of security development guidelines and are thoroughly tested accordingly, to ensure they are robust and reliable. Paper files: are stored in secured cupboards/ offices and periodically archived in the Central Archive
		only accessible to duly authorised post holders.
		User accesses follow the minimum need to know basis to fulfil the purpose, following common rules and managed through controlled access process for established user groups.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	https://www.eurojust.europa.eu/data-protection- notice-processing-personal-data-context-eurojust- financial-transactions, which provides information to data subjects about the exercise of their rights to
	[While publishing the data protection notice is not strictly speaking part of the record, doing so increases transparency and adds no administrative burden, since it already exists.]	access, rectify or restrict the processing of their personal data is published on Eurojust website and Intranet.