



## 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

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

Nr.	Item	Description
<b>Accounting Procedures and Transactions</b>		
1.	<b>Last update of this record</b>	<b>5 April 2023</b>
2.	<b>Reference number</b> [For tracking, please contact the DP Office for obtaining a reference number.]	<b>ACC-01 v.3</b>
3.	<b>Name and contact details of controller</b> [Use functional mailboxes, not personal ones, as far as possible - this saves time when updating records and contributes to business continuity.]	Accounting Officer, <a href="mailto:Accounting@eurojust.europa.eu">Accounting@eurojust.europa.eu</a>
4.	<b>Name and contact details of DPO</b>	<a href="mailto:DPO@eurojust.europa.eu">DPO@eurojust.europa.eu</a>
5.	<b>Name and contact details of joint controller (where applicable)</b>	<p>The Directorate General for Budget (<b>DG BUDG</b>), <b>European Commission</b>, is responsible for the development and maintenance of the central EC Accounting system in use at Eurojust (ABAC, SUMMA). Any information related to processing of personal data in the system is detailed in the <a href="#">register of the Data Protection Officer of the Commission</a>.</p> <p>All financial data is entered into the system, including personal data such as names, dates of birth, addresses, bank accounts. The Commission decides on the retention period for the different data categories and the way of deletion after the retention period.</p> <p><b>Contact:</b> DG BUDG, Unit C1, contact page <a href="https://europa.eu/european-union/contact/write-to-us_en">https://europa.eu/european-union/contact/write-to-us_en</a></p>

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	<p>[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.]</p>	
6.	<p><b>Name and contact details of processor (where applicable)</b></p> <p>[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).]</p>	N/A
7.	<p><b>Purpose of the processing</b></p> <p>[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).]</p>	<p>The purpose of this process is to implement the budget of Eurojust, to prepare the annual accounts and to comply with legal obligations: Eurojust Regulation, Financial Regulations (General FR, Framework FR and Eurojust FR), International Public Sector Accounting Standards (IPSAS) and EU Accounting Rules, <a href="#">EU legal context of anti-money laundering and countering the financing of terrorism (europa.eu)</a>, in particular <a href="#">Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015 on information accompanying transfers of funds and repealing Regulation (EC) No 1781/2006 (Text with EEA relevance)</a>, College Decisions, Management Board Decisions, Executive Board Decisions, Administrative Director Decisions, Eurojust Policies, contracts and Article 8 of Host State Agreement dated 15 March 2006.</p> <p>The processing of the personal data is also necessary for:</p> <ul style="list-style-type: none"> <li>• The performance of a contract to which the data subjects are party or in order to take steps at their request prior to entering into a contract.</li> <li>• Granting Eurojust a direct VAT exemption on purchases for official use via the VAT exemption certificates, and</li> <li>• Refund Eurojust for VAT paid on its purchases for official use (indirect exemption).</li> </ul> <p>In case of absence of this processing, no contracts with or financing decisions in favor of the data subject could be concluded and no monitoring of the correct execution of these contracts/decisions</p>

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		<p>would be possible.</p> <p>All financial transactions are processed in the central EC financial and accounting system set up by the Commission.</p> <p>To fulfil its duties determined in the relevant legislation, the Accounting Officer and his/her team process the following personal data:</p> <ul style="list-style-type: none"> <li>• Identification data: name, date of birth, copy of identification document, signatures of the Administrative Director, the bank proxies and users of credit cards (incl. virtual credit cards);</li> <li>• Subject matter of bank transfer: contract, order, invoice, meeting, cost claim, event. This type of information may be randomly provided to the processors listed in section 6 on the basis of the requests received from those in accordance to the <a href="http://europa.eu">EU legal context of anti-money laundering and countering the financing of terrorism (europa.eu)</a>. The banks screen payments to ensure compliance with applicable laws and regulations (including sanctions), as well as their own internal risk policies. In order to verify whether a payment is subject to applicable international restrictions or sanctions, more information/details regarding the payment may be requested.</li> <li>• Contact details: email address, postal address, telephone numbers, company, departments, function, country of residence;</li> <li>• Financial information: bank account details, VAT numbers for sending payment orders to the banks for execution per legal entity and post-holder, salary grades;</li> <li>• Annual leave carried over per staff member and their grade – to calculate the accruals for the annual accounts as part of the cut-off;</li> <li>• Payroll – to extract the monthly payroll files from BOXI and prepare the monthly salary regularization in excel for HR to enter in the accounting system and for staff to be paid; to follow up on staff debts;</li> <li>• Reports for payables and receivables per supplier and debtor, incl. EJ post-holders.</li> </ul> <p>To fulfill the above, the Accounting Officer and his/her team has access to the following data:</p> <ul style="list-style-type: none"> <li>• Unique identification and registration of beneficiary's identity (named Business Partner) and beneficiary's bank account details (named Bank Account). For details, please consult the relevant DG BUDG Privacy Statement on the validation of <a href="#">Legal</a></li> </ul>

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		<p><u>Entities and Bank Accounts:</u></p> <ul style="list-style-type: none"> <li>• Budgetary commitments: transactions by which Eurojust earmarks funds to cover one or more future expenses;</li> <li>• Legal Commitments: following the approval of the budgetary commitment, a legal commitment might be signed by the authorizing officer or grant agreement concluded with a third party;</li> <li>• Invoices received from suppliers: transactions in which Eurojust registers financial details of each supplier that will be processed for payment;</li> <li>• Cost claims received from grant beneficiaries, mission claims received from Eurojust post-holders, and external participants to Eurojust meetings, staff entitlements;</li> <li>• Payments: operations that release Eurojust from an obligation to a creditor, based on invoice, cost claim, mission claim, staff entitlements and supporting documents proving the delivery of the goods or provision of services;</li> <li>• Transfers between budget lines: budget transfers occur when, in the course of a financial year, appropriations are transferred from one budget line to another;</li> <li>• Recoveries: to recover any debts towards Eurojust;</li> <li>• Payroll reports in the Reporting tool (Business Objects) of PMO.</li> </ul>
8.	<p><b>Description of categories of persons whose data are processed and list of data categories</b></p> <p>[In case data categories differ between different categories of persons, please explain as well.]</p>	<p>Categories of persons:</p> <ul style="list-style-type: none"> <li>• Eurojust post holders (Staff, National Members and their Deputies and Assistants, Seconded National Experts, Interims and Interns),</li> <li>• Suppliers: legal entities having signed a contract/purchase order with Eurojust,</li> <li>• Grant Beneficiaries,</li> <li>• Externals who attend Eurojust meetings,</li> <li>• Selection Board Members and Recruitment candidates.</li> </ul> <p>Personal data processed:</p> <ul style="list-style-type: none"> <li>• Identification data: name, surname, business title, date and place of birth where necessary, a copy of an identification document;</li> <li>• Subject matter of bank transfer: contract, order, invoice, meeting, cost claim, event;</li> <li>• Contact details: postal address, name of the organization,</li> </ul>

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		<p>country of residence, telephone number, email address;</p> <ul style="list-style-type: none"> <li>• Financial information: bank account details (IBAN), VAT numbers, name, surname and postal address of account holder, bank certificates, salary grade, payables and receivables;</li> <li>• Signature or e-Signature;</li> <li>• Information and supporting documents submitted justifying the reimbursement (flight and rail bookings, travel documents, invoices related to the reimbursement, etc.);</li> <li>• Annual leave carried over per staff member and their grade;</li> <li>• Payroll.</li> </ul>
9.	<p><b>Time limit for keeping the data</b></p> <p>[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 made it onto the reserve list vs. those who did not).]</p>	<p>The data related to financial transactions, other than those related to missions and travel reimbursements is electronically archived in the central EC Accounting system and therefore is retained according to Commission's data retention policy:</p> <ul style="list-style-type: none"> <li>• a maximum of 10 years after the last transaction for data related to natural persons other than Commission staff;</li> <li>• up to 100 years after date of birth for Commission staff (to satisfy any request that may come in after the end of a staff member's contract or after their retirement).</li> </ul> <p>The above data will be automatically deleted after the end of the retention period.</p> <p>Data related to bank statements, bank proxies, payroll, year-end and cut-off transactions and preparation of annual accounts, such as annual leave carried over, pre-payments, accrued expenditure, receivables and payables at year-end, provisions, other assets and liabilities, is retained in the document management system (DMS) of Eurojust.</p> <p>Those data is kept for 7 years after the end of the financial year in which the last transaction has been processed. At the end of the retention period the data is manually deleted from DMS by the Accounting Office.</p> <p>For the retention period of financial transactions data related to missions and travel reimbursements, please refer to the relevant record of activities of Eurojust Missions Approval and Planning System</p> <p><a href="#">Data Protection Notice</a> for EJ MAP.</p> <p>The paper files are retained by ACC for a period of 7 years after the end of the financial year in which the payments have been processed, complying with the EU Financial Regulation. At the end of the retention period, the data is manually destroyed by ACC staff member assigned by the Accounting Officer to check the register of paper archive files and make a proposal on the files to be destroyed. The manual files are destroyed following the specific procedure.</p>

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10.	<p><b>Recipients of the data</b></p> <p>[Who will have access to the data within Eurojust? Who outside Eurojust will have access? Note: no need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS).]</p>	<ul style="list-style-type: none"> <li>• <b>Banks</b> (bank accounts of Eurojust and physical corporate credit cards)</li> </ul> <p>All payments are sent to the banks and personal data are transferred to banks in order to execute payments. The authorized persons in Eurojust to manage the bank accounts (the signatories in the Accounting Office) provide their personal data (names, address, date of birth, signatures, copies of identification documents) to the banks where the cash of Eurojust is kept. The personal data of the Administrative Director as being the legal representative of Eurojust is provided too.</p> <p>Contacts:</p> <p>ING Belgium <a href="https://www.ing.be/en/retail/daily-banking/current-accounts/privacy">https://www.ing.be/en/retail/daily-banking/current-accounts/privacy</a></p> <p>BNP Paribas Fortis <a href="https://invest.bnpparibas.com/en/about-bnp-paribas">https://invest.bnpparibas.com/en/about-bnp-paribas</a> and their <a href="#">Data Protection Notice - BNP Paribas CIB</a></p> <ul style="list-style-type: none"> <li>• <b>AirPlus</b> (virtual credit cards)</li> </ul> <p>AirPlus is an authorized company providing possibility to create virtual credit cards. There are administrators who manage the application, the team in the Accounting Office. Those administrators provide their personal data to AirPlus (name, date of birth, address). The administrators assign users who are allowed to create and use virtual credit cards. The personal data (name, date of birth) of those users is provided to AirPlus.</p> <p>Contacts:</p> <p><a href="https://www.airplus.com/corporate/en/disclaimer-and-contact/privacy-statement/privacy-statement.html">https://www.airplus.com/corporate/en/disclaimer-and-contact/privacy-statement/privacy-statement.html</a></p> <ul style="list-style-type: none"> <li>• <b>Tax Authorities</b></li> </ul> <p>The Dutch Tax Authorities refund directly or indirectly to Eurojust the VAT it has paid for purchases for official use. For this purpose, the Tax Office may need to receive copies of invoices and/or contracts.</p> <ul style="list-style-type: none"> <li>• Administrative Director, Heads of Resources, Heads of Units, Secretariats, Offices,</li> <li>• Auditors,</li> <li>• Other delegated/authorised post-holders of Eurojust.</li> </ul> <p>The following data may be randomly provided to the recipients on the basis of the requests received from those in accordance to the <a href="#">EU legal context of anti-money laundering and countering the financing of terrorism (europa.eu)</a>: subject matter of bank transfer - contract, order, invoice, meeting, cost claim, event. The banks screen payments to ensure compliance with applicable laws and regulations (including sanctions), as well as their own internal risk policies. In order to verify whether a payment is subject to</p>

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		applicable international restrictions or sanctions, more information/details regarding the payment may be requested. Data subjects are informed about this via Data Protection notice concerning processing of personal data in the context of Eurojust accounting procedures.
11.	<p><b>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</b></p> <p>[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.]</p>	<p>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) via the bank transfers.</p> <p>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.</p>
12.	<p><b>General description of security measures, where possible.</b></p> <p>[Include a general description of your security measures that you could also provide to the public.]</p>	<p>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.</p> <p>Paper files are stored in secured cupboards/offices and periodically archived in the Central Archive only accessible to duly authorised post holders such as financial actors from BFP or other units and management.</p> <p>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.</p>
13.	<p><b>For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:</b></p> <p>[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.]</p>	<p>A Data Protection Notice which provides information to data subjects about the exercise of their rights to access, rectify or restrict the processing of their personal data is published on <a href="#">Eurojust website</a> and <a href="#">Intranet</a>.</p>

