



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
FINANCIAL TRANSACTIONS		
1.	Last update of this record	10 th September 2024
2.	Reference number [For tracking, please contact the DP Office for obtaining a reference number.]	BFPU-03.03 (June 2024)
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.]	Budget Finance and Planning (BFP) Head of the Unit, as data controller, can be contacted at BFpdatacontroller@eurojust.europa.eu
4.	Name and contact details of DPO	dpo@eurojust.europa.eu
5.	Name and contact details of joint controller (where applicable)	<p>The Directorate General for Budget (DG BUDG), European Commission, is responsible for the development and maintenance of the central EC Financial and Accounting system in use at Eurojust (ABAC for consultation and SUMMA). Any information related to processing of personal data in ABAC is detailed in the register of the Data Protection Officer of the Commission.</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>Contact: DG BUDG, Unit C1, email: EC-SUMMA-HELPDESK@ec.europa.eu</p>

Nr.	Item	Description
	<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>1/ Name and contact details of processor (where applicable)</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> <p>2/ Persons processing under the authority of the controller according to Article 30 of Regulation (EU) 2018/1725 (“internal processors”)</p>	<p>2/ BFP Unit: Initiating Agents (IAs), Verifying Officers (VAs) and Authorising Officers by delegation (AODs), BFP's Missions Sector staff (Mission Officer (MO), Budget Support Officer (BSO) and Budget Officer (BO) roles)</p>
7.	<p>Purpose of the processing</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 and to comply with legal obligations as foreseen in the relevant College Decisions (e.g. on the Financial Regulation applicable to Eurojust), Administrative Director Decisions, Eurojust Decisions and Policies.</p> <p>All financial transactions are processed in SUMMA, the new integrated financial system that European Commission anticipated to Eurojust in November 2021 as one of the three pilot EU Agencies. SUMMA has been released in January 2022 at Eurojust and used to monitor the execution of its budget and to prepare its accounts.</p> <p>At Eurojust, the <u>decision on financial circuits and segregation of duties at Eurojust</u> is established based on the 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.</p> <p>Prior to Eurojust entering any financial and contractual transaction, a unique identification and registration of a third party Business Partner that refers to the beneficiary's identity (named Legal Entity) and the beneficiary's bank account details (named Bank Account) are required. The establishment and</p>

Nr.	Item	Description
		<p>validation of the Business Partner is managed by Eurojust SUMMA end-users and the Central Validation Team of DG BUDG performs ex-post control on them. For details, please consult the relevant Training materials on Business Partners.</p> <p>The financial transactions processed by Eurojust are:</p> <ul style="list-style-type: none"> - Fund reservation: transaction by which Eurojust earmarks funds to cover any future expense that will be performed in the future. Each fund reservation validates the reservation of the budget and is approved based on supporting documents associated with the transaction; - De-commitment: operation where the reservation of appropriations previously made by the mean of a fund reservation are cancelled partially or fully; - Purchase order: simplified form of a direct contract, which may be used for simple purchases. The purchase order replaces the ABAC Legal Commitment which is a contract or grant agreement signed by the authorizing officer with a third party which results in subsequent payment(s) and the recognition of the expenditure charged to the budget; - Registration of invoices received from suppliers: transactions in which Eurojust registers financial details of each supplier that will be processed for payment. - Payments (advance payments, payment directives and mass payment regularisation via general journal entries in SUMMA): 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 it is shown that there is a debt towards Eurojust, therefore the money need to be recovered. It is also any amount receivable that is identified as being certain, of a fixed amount and due shall be established by a recovery order by which the

Nr.	Item	Description
		<p>authorizing officer responsible signs to recover the amount;</p> <p>- Settlement of mission expenses (SoE): an operation which consists in the verification of eligibility of expenses in line with the applicable Eurojust Financial Regulation, College Decisions, Administrative Director Decisions, Eurojust Decisions and Policies. If the SoEs are managed within the Eurojust Missions Approval and Planning (EJ MAP), a mass payment regularization validation is done in SUMMA via the general journal entries functionality. It allows bulk payments to different Eurojust stakeholders including Eurojust post holders. If the SoEs are managed outside EJ MAP, the payment can be done via a payment directive and/or a mass payment regularization. The payments are processed in line with the financial circuits of a unit.</p>
8.	<p>Description of categories of persons whose data are processed and list of data categories</p> <p>[In case data categories differ between different categories of persons, please explain as well.]</p>	<p>Personal data is processed for the following categories of persons:</p> <ul style="list-style-type: none"> - 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, ICPA and Western Balkans Criminal Justice meetings as well as Selection Board Members and Recruitment candidates. <p>In this respect, the data processed by BFP may involve the following personal data:</p> <ul style="list-style-type: none"> 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 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 (e.g. flight and rail bookings, travel documents, accommodation invoices, tickets, invoices related to the reimbursement, etc.);

Nr.	Item	Description
9.	<p>Time limit for keeping the data</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 processed is stored in several ways:</p> <p>The data related to financial transactions is electronically archived in SUMMA and is retained according to the <u>Eurojust's data retention policies</u>.</p> <p>The financial transactions data related to missions and travel reimbursements are processed in EJ MAP, Eurojust's IT tool for missions planning, approval and reimbursement, and are electronically archived in the tool. A separate record of processing activities is available for EJ MAP. The only exception relates to ICPA missions and travel reimbursements for external participants that are in paper files. By the end of 2024 or beginning of 2025, it is planned that they would be processed in EJ MAP (paperless).</p> <p>All types of data related to financial transactions are 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 31st 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 the Financial Regulation.</p> <p>Automatic deletion following the retention period is implemented in EJ MAP.</p>
10.	<p>Recipients of the data</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>	<p>-All SUMMA users with an authorised license in accordance with access entitlements:</p> <ul style="list-style-type: none"> - Hierarchical Superiors/Line Managers; - Information Management Unit – Application Management; - Other delegated/authorised Post-holders of Eurojust. - Banks: All payments are sent to the banks. Its personal data is transferred to them in order to execute payments sent by the Eurojust bank accounts authorized persons (the signatories in the Accounting Office). On the basis of requests received from banks in accordance with <u>the EU legal context of anti-money laundering and countering the financing of terrorism</u>, the bank could request additional personal data to perform compliance request, e.g. full legal name, permanent place of residence including city and country, date and place of birth, occupation/ profession etc.

Nr.	Item	Description
11.	<p>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</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 may be 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, in line with Article 50 of Regulation (EU) 2018/1725. 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 SUMMA, however, the data provided by the beneficiary is extracted from the system.</p> <p>In line with the College, Administrative Director and Policies on reimbursements of travel costs both for externals, recruitment candidates and Selection Board members, payments can be made to any third countries or organisations within the EU or outside.</p>
12.	<p>General description of security measures, where possible.</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>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>For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:</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, 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 access, rectify or restrict the processing of their personal data is published on Eurojust website.</p>