



## 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>Financial and logistical support (grants) to activities of Joint Investigation Teams (“JITs”)</b>		
1.	<b>Last update of this record</b>	24 November 2021
2.	<b>Reference number</b> [For tracking, please contact the DP Office for obtaining a reference number.]	JITS-01-04 (November 2021)
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.]	Head of JITs Network Secretariat <a href="mailto:JITS@eurojust.europa.eu">JITS@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> [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.]	Not applicable

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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>	Eurojust duly authorised post holders from JITs Network Secretariat
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>Upon receipt of grant application including its attachments, reimbursement request including supporting documents, and/or equipment request, personal data is collected and further processed for the purpose of the management of the grant procedures carried out by Eurojust.</p> <p>Data is necessary for assessing:</p> <ul style="list-style-type: none"> <li>– the eligibility and admissibility of grant applications including their attachments,</li> <li>– applicants’ compliance with selection criteria,</li> <li>– competency of the claimants/beneficiaries to submit claims for reimbursement,</li> <li>– entitlement of representatives of judicial and law enforcement authorities to receive reimbursement of incurred costs,</li> <li>– verifying the eligibility of invoices for translation, interpretation, and specialist expertise which are subject of reimbursement, and</li> <li>– entitlement of equipment users.</li> </ul> <p>The processed information is necessary and kept throughout the grants procedure and later on for audit purposes for a well-defined retention period.</p>
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> <ol style="list-style-type: none"> <li>a) JIT leaders, JIT members, National Experts on JITs, Eurojust College Members, Europol Liaison Officers involved in the application procedure;</li> <li>b) Representatives of judicial and law enforcement authorities involved in reimbursement process, including those incurring related costs;</li> <li>c) Translators and interpreters providing translation/interpretation services to JITs, which are subject of reimbursement;</li> <li>d) Experts providing specialist expertise to JITs, which is subject of reimbursement;</li> <li>e) JIT leaders and JIT members entitled to use the Eurojust</li> </ol>

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		<p>equipment.</p> <p>Data categories: name(s), surname, rank/position, business contact details – telephone, email, national authority, address and bank details of national authority</p> <p>As of October 2021, financial support is also available to cover costs related to victims and witnesses. However, personal data of victims and witnesses are not processed – the claimants claiming reimbursement of costs incurred by victims/witnesses are requested to use other means of identification of victims/witnesses for reimbursement purposes (e.g. numbers or nicknames).</p>
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>a) Grant applications</p> <p>In the JITs Portal and electronic application system (JITs-PS), only draft applications including applicants' contact details are stored for 45 days; after this time, all information is automatically deleted.</p> <p>Grant applications submitted via JITs-PS are automatically transmitted to secure isolated system – JITs System. Related email communication with applicants is manually saved in JITs System.</p> <p>Applications (including attachments) submitted by email, i.e. applications for funding outside the scope of the standard funding scheme with call for proposals, are manually inserted to the JITs System.</p> <p>Personal data related to successful (awarded) applications including their attachments are stored in JITs System for duration of five (5) years following data entry in the system. Personal data related to unsuccessful (rejected, not awarded) and withdrawn applications including their attachments are stored in JITs System for duration of two (2) years following data entry in the system.</p> <p>Continued storage of personal data beyond this period may be justified for audit purposes exclusively and shall be subject to a specific deadline.</p> <p>The user's activities, including username and use of the JITs Portal/System, are logged for verification of lawfulness of processing, ensuring the integrity and security of personal data and retained electronically for a maximum period of one (1) year.</p> <p>b) Reimbursement requests</p> <p>Personal data included in Reimbursement Claim Forms including the supporting documents (submitted by email only) are kept internally for a period of 5 years following the final payment related to particular grant. (Final report on the reimbursement is stored in ABAC<sup>1</sup>, with own retention rules.)</p> <p>c) Equipment requests</p> <p>Personal data included in IT equipment requests (submitted by email only) are kept for a period of 3 years following the return of the lent</p>

<sup>1</sup> Accrual Based Accounting – system of the European Commission

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		equipment items.
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>	<p>Eurojust:</p> <ul style="list-style-type: none"> <li>- Duly authorised staff members from Budget, Finance and Planning Unit, Casework Unit, Legal Affairs Unit, Events and Logistics Unit, Accounting Office, Information Management Unit on a need to know basis in order to carry their direct tasks including participation in the evaluation committees;</li> <li>- College Members participating in the evaluation committees based strictly on need to know basis;</li> <li>- National Desks and EJ liaison prosecutors upon a reasoned request in order to follow up the application, reimbursement claim or IT equipment request, and communicate with the applicant, claimant or equipment user.</li> </ul> <p>Outside Eurojust:</p> <ul style="list-style-type: none"> <li>- Representatives of national authorities being from the same national authority as applicants, claimants or equipment users - based strictly on need to know basis, upon a reasoned request;</li> <li>- Resulting from the “Memorandum of Understanding on the joint establishment of rules and conditions for financial support to joint investigation team activities between Europol and Eurojust”, personal data (i.e. name and surname) of JIT members and/or other public authorities participating in cross-border operational activities of the JIT or by third parties mandated by them to participate in such activities, who incurred travel and accommodation costs may be transferred to Europol to assess compliance with the principle of a cumulative award. Such information is to be exchanged at the stage of reimbursement of costs once the completed Reimbursement Claim Form is provided. For such data exchange, contact persons (recipients of data) and contact email address are agreed between both agencies. Data would be transferred in el. format by business email.</li> </ul>
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><u>Application stage</u></p> <p>Third countries (TC) cannot apply for funding, they do not have access to the JITs Portal. If a JIT is set up between EU MS and TC, a funding application is submitted by EU MS. The acknowledgement and decision email is sent in a blind copy to respective EJ liaison</p>

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	<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>prosecutor(s).</p> <p>The EU MS applicant can provide in the application an additional email address he/she deems necessary. This email could be of JIT member/leader from TC. As a common practice, we send the acknowledgement and award email to all emails mentioned in the application, thus also to TC if applicable, for informative purposes and possible follow up.</p> <p><u>Reimbursement stage</u></p> <p>TC are entitled to claim reimbursement of costs incurred for the purposes of a JIT which is awarded a grant. TC complete Reimbursement Claim Form (RCF) mentioning all incurred costs, including names of JIT members, JIT leaders and translators/interpreters/experts who incurred the costs. If the claim needs to be completed or corrected, we contact a person nominated in the RCF and we send him/her the respective sheets of the monitoring table, including the personal data originally included in the RCF by the beneficiary.</p> <p>Once the claim is complete, we send a summary table – without personal data, but with IBAN of national authorities – to all beneficiaries who claimed reimbursement of costs under the same award, also to beneficiaries from TC if applicable. A copy of such email is sent to respective EJ liaison prosecutors, for informative purposes and possible follow up</p> <p>If a split of costs is necessary when the awarded amount is exceeded, beneficiaries are asked to decide on a distribution of funds. A copy of a respective excel sheet – without personal data - is sent to all beneficiaries.</p> <p>This practice might be re-considered in the future.</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>a) All post holders and College Members participating in evaluation committees sign a "Declaration of absence of conflict of interests and of confidentiality";</p> <p>b) Eurojust post holders responsible for management of grant procedures (including reimbursement and equipment requests) have security clearances at least at the level "CONFIDENTIAL";</p> <p>c) All electronic and hard copies of documents including personal data are stored securely in secure systems/archive, with limited access to authorised Eurojust staff only.</p>

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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><u><i>Data protection notice</i></u></p>