



## DATA PROTECTION NOTICE

### For processing of personal data in the context of Eurojust accounting procedures

#### 1. Context and Controller

As Eurojust collects and further processes personal data, it is subject to *Regulation (EU) 2018/1725 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*.

Collection and processing of personal data within accounting procedures are under the responsibility of the Controller, who is the Head of the Accounting Office and can be contacted at [accounting@eurojust.europa.eu](mailto:accounting@eurojust.europa.eu).

#### 2. What personal information do we collect, for what purpose, under which legal bases and through which technical means?

##### **Legal basis**

The legal basis for the processing operations on personal data is:

- 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, in particular Article 5(1) (b) and (c):
  - (b) processing is necessary for compliance with a legal obligation to which the controller is subject;
  - (c) processing is necessary 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 contract;
- Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union;
- the Eurojust Regulation;
- the Framework Financial Regulation;
- the [International Public Sector Accounting Standards \(IPSAS\)](#) and EU Accounting Rules,
- [EU legal context of anti-money laundering and countering the financing of terrorism \(europa.eu\)](#), [Guidelines on the role of AML/CFT compliance officers | European Banking Authority \(europa.eu\)](#), more specifically [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 \(Text with EEA relevance\)](#);
- College Decisions;
- Management Board Decisions;
- Executive Board Decisions;
- Administrative Director Decisions;
- Eurojust Policies and
- the Host State Agreement dated 15 March 2006.

The processing of your personal data is also necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract. In case of absence of this processing, no contracts with or financing decisions in favour of the data subject could be concluded and no monitoring of the correct execution of these contracts/decisions would be possible.



### ***Purpose of the processing***

The purpose of this process is to implement the budget of Eurojust, to prepare the annual accounts and to comply with legal obligations.

### ***Technical means***

Your personal data are provided by submission of payment orders or other information electronically or on paper.

The information is processed by the Accounting Office and transferred into the central EC Accounting system in use at Eurojust (ABAC, SUMMA), Eurojust's banks or stored on DMS/ in a secured archive if on paper, under the responsibility of the Controller.

### ***Types of personal data***

Personal data collected and further processed concern debtors, suppliers, external participants to Eurojust meetings, grant beneficiaries, selection board members, recruitment candidates, debtors, and post holders. Information can relate to the following data:

- a) 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);
- b) Subject matter of bank transfer: contract, order, invoice, meeting, cost claim, event;
- c) Contact details: email address, postal address, telephone numbers, company, departments, function, country of residence;
- d) Financial information: bank account details, VAT numbers for sending payment orders to the banks for execution per legal entity and post-holder;
- e) Annual leave carried over per staff member and their grade – to calculate the accruals for the annual accounts as part of the cut-off;
- f) Payroll – to extract the monthly payroll files from the Reporting tool of PMO (Business Objects) and prepare the monthly salary regularization in excel for HR to enter into the accounting system and for staff to be paid; to follow up on staff debts;
- g) Reports for payables and receivables per supplier and debtor, incl. EJ post-holders.

### **3. Who has access to your personal data and to whom is it disclosed?**

For the purpose detailed above, access to your personal data is given to the following persons, without prejudice to a possible transmission to the bodies in charge of a monitoring or inspection task in accordance with European Union law:

- a) Banks,
- b) AirPlus (virtual credit cards),
- c) Administrative Director, Heads of Departments, Heads of Units, Secretariats and Offices,
- d) Auditors,
- e) Dutch Tax Authorities,
- f) Other delegated/authorised post-holders of Eurojust.

The following data may be randomly provided to the entities listed in point (a) of this section on the basis of the requests received from those in accordance to the EU legal context of anti-money laundering and countering the financing of terrorism (europa.eu): 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



applicable international restrictions or sanctions, more information/details regarding the payment may be requested.

#### **4. How do we protect and safeguard your information?**

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 such as financial actors from BFP or other units and management.

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.

#### **5. How can you verify, modify or delete your information?**

In case you wish to verify which personal data is stored on your behalf by the Controller, have it modified, corrected, or deleted, or restrict the processing, or to exercise the right to data portability where applicable, please make use of the following email address: [accounting@eurojust.europa.eu](mailto:accounting@eurojust.europa.eu), by explicitly describing your request.

In the event of questions regarding the processing of personal data, Eurojust's Data Protection Officer can be contacted via e-mail at [dpo@eurojust.europa.eu](mailto:dpo@eurojust.europa.eu).

#### **6. How long do we keep your personal data?**

The data related to financial transactions, other than those related to missions and travel reimbursements is electronically archived into the central EC Accounting system and therefore is retained according to Commission's data retention policy:

- a maximum of 10 years after the last transaction for data related to natural persons other than Commission staff;
- 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).

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.

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.

For the retention period of financial transactions data related to missions and travel reimbursements, please refer to the [Data Protection Notice for EJ MAP](#).

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 in secured bins provided by the Security Unit. Every year ACC staff member assigned by the Accounting Officer checks the register of paper archive files and makes a proposal on the files to be destroyed.



EUROJUST

The European Union's Judicial Cooperation Unit

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## 7. Contact information

In case of queries regarding the processing of personal data, Eurojust Data Protection Officer can be contacted via email address: [dpo@eurojust.europa.eu](mailto:dpo@eurojust.europa.eu).

## 8. Recourse

You have the right to lodge a complaint to the European Data Protection Supervisor via email: [edps@edps.europa.eu](mailto:edps@edps.europa.eu) or following the link: [https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en](https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data.