



## European Ombudsman

### Secretary General

Personnel, Administration and Budget Unit

### European Ombudsman

#### Public record of processing activity<sup>1</sup>:

#### **Billing of telephone consumptions by the European Parliament to the European Ombudsman**

**1. Last update of this record:** 21.08.2020

**2. Reference number<sup>2</sup>:** 16/2020

**3. Name and contact details of the controller<sup>3</sup>:** European Ombudsman, 1 avenue du Président Robert Schuman, CS 30403, F-67001 Strasbourg Cedex- Contact: PAB Unit, e-mail: [EOinvoice@ombudsman.europa.eu](mailto:EOinvoice@ombudsman.europa.eu)

Responsible department: Personnel, Administration and Budget (PAB) Unit

**4. Name and contact details of the Data Protection Officer:** Mr Juliano Franco, [Dpo-Euro-Ombudsman@ombudsman.europa.eu](mailto:Dpo-Euro-Ombudsman@ombudsman.europa.eu)

**5. Name and contact details of the processor<sup>4</sup>:** N/A

**6. Name and contact details of the joint controller(s)<sup>5</sup>:** European Parliament (EP) s- Rue Wiertz-1047 Brussels- +32-(0)2 28 4 21 11

**7. Purpose(s) of the processing<sup>6</sup>:** to manage the billing of telephone consumptions by the European Parliament to the European Ombudsman.

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<sup>1</sup> To be filled in by the controller. See Article 31(1) and (5) on records of processing activities of Regulation 2018/1725: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

<sup>2</sup> For tracking. If the office decides to keep a central register, contact the keeper of that register to obtain a reference number.

<sup>3</sup> Use functional mailboxes as far as possible to ensure business continuity.

<sup>4</sup> 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).

<sup>5</sup> Where applicable. If you are jointly responsible with another EU institution, please indicate so here (e.g. two institutions with shared medical service). If this is the case, make sure to mention in the description who is in charge of what and who people can address for their queries.

<sup>6</sup> 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).



### Description of the processing:

According to the [administrative cooperation agreement between the Secretary General of the European Parliament and the EO of 15 March 2006](#), the European Parliament (EP) provides the EO with a set of services, in particular telephone services. The EO has his own budget to cover the payment of these services. In line with [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 \("Financial Regulation"\) and its implementing rules](#), the related costs are reimbursed to the EP, as the latter, for operational reasons, pays them directly to third parties.

The EP sends by email to the Head of PAB Unit and to the functional mailbox "EOinvoice" a monthly report (per quarter, with monthly consumption) of the telephone consumptions that consists of two different documents:

- 1) A PDF file that shows the consumption of the current month. The information is broken down by telephone number, name of the person, number of calls, total duration, total cost;
- 2) An Excel file ("*tableau récapitulatif*") that shows the consumption of the current year, broken down by the total cost per quarter, per month and per telephone number, name of the person, number of calls, total duration, total cost.

The reimbursement of these costs is made upon the reception of an invoice issued by the EP to the EO, on a quarterly basis. The PDF document represents the background information to complete the Excel table. The Excel table is the supporting document used for the further reimbursement of the costs to the EP by means of a financial transaction (payment order) in the accounting IT tool (ABAC).

The Finances sector encodes the payment in ABAC and circulates the file related to the financial transaction under process, for validation and signature of the Authorising officer by delegation or the Authorising officer by subdelegation via ABAC. Once it has been signed and validated into ABAC, the transaction and the supporting documents with only the "*tableau récapitulatif*" is stored on the network drive accessible only to the Finances sector (5 staff members). Only the hard copy of the debit note, without personal data, is stored in the physical archive.

The legal basis are the administrative cooperation agreement between the Secretary General of the European Parliament and the EO of 15 March 2006, and the Financial Regulation and its implementing rules of 18 July 2018.

### **8. Description of the categories of data subjects and of the categories of personal data<sup>7</sup>:**

- Categories of data subjects: All staff of the European Ombudsman (officials, temporary and contract agents, trainees, seconded national experts).

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<sup>7</sup> In case data categories differ between different categories of persons, please explain as well (e.g.: suspects vs. witnesses in administrative inquiries)



- Categories of personal data:

- name and surname;
- phone numbers (business telephone number, professional mobile telephone number);
- monthly telephone consumption (number of calls, total duration, total cost).

**9. Time limit for keeping the data and, where possible, for erasure<sup>8</sup>:** Data collected by the EO (paper files) for processing the reimbursement of the costs (payment order in ABAC) are stored in locked cupboards for 5 years after the discharge procedure. The “*tableau récapitulatif*” is the only one kept in those paper files. Only the hard copy of the debit note, without personal data, is stored in the physical archive. The EP's email sent to the Head of PAB Unit and to the functional mailbox EOinvoice containing the monthly report on the telephone consumptions is deleted directly afterwards.

**10. Recipients of the data<sup>9</sup>:** the EO, the Secretary General and the members of PAB Unit- Finances sector.

**11. Are there any transfers of personal data to third countries and/or to International Organisations?<sup>10</sup>:** N/A

**12. General description of security measures<sup>11</sup>:** Data collected by the EO (paper files) for processing the reimbursement (payment order in ABAC) of the costs are stored in locked cupboards. The EP's email sent to the Head of PAB Unit and to the functional mailbox EOinvoice containing the monthly report on the telephone consumptions is deleted directly afterwards. Only the members of the Finances sector have access to this functional mailbox.

**13. Information on how data subjects can exercise their rights of access and rectification, and where applicable, of erasure, restriction and data portability<sup>12</sup>:**

Data subjects have the right of access to their own personal data and to relevant information concerning how the EO uses it. They have also a right to request from the EO rectification of any incomplete or inaccurate data concerning them. They have a right to object to the use of their data by the EO on grounds relating to their particular situation, at any time. Under certain conditions, they have the right to ask that the EO deletes their personal data or restricts its use. The EO will reply to

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<sup>8</sup> 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).

<sup>9</sup> Who will have access to the data within the European Ombudsman? Anyone outside the office? No need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EDPS, Court of Auditors).

<sup>10</sup> If yes, include the identification of the country or International Organisation and the documentation of suitable safeguards (e.g. processor in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty).

<sup>11</sup> Where possible. Include a general description of your security measures that you could also provide to the public. See Article 33 on security of processing of Regulation 2018/1725: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

<sup>12</sup> Consider publishing the relevant part of the privacy statement and providing a link. See Articles 15 and 16 on the information to be provided to the data subject(s) and Article 17 to 22 on the rights of data subjects of Regulation 2018/1725: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>



their requests as soon as possible and within one month at the latest. Data subjects may ask the EO information concerning the processing of their personal data by e-mail ([eo@ombudsman.europa.eu](mailto:eo@ombudsman.europa.eu)). Data subject may also contact the EO Data Protection Officer at any time: [dpo-eo-ombudsman@ombudsman.europa.eu](mailto:dpo-eo-ombudsman@ombudsman.europa.eu).

If data subjects wish to complain about the Ombudsman's handling of their personal data, they may contact the European Data Protection Supervisor: [www.edps.europa.eu](http://www.edps.europa.eu)]

A specific privacy statement is available (in attachment to the record).



# Privacy Statement

## relating to the billing of telephone consumptions by the European Parliament to the European Ombudsman

This privacy statement explains the reason for the processing, the way the European Ombudsman (EO) collects, handles and ensures protection of all personal data provided, how that information is used and what rights the data subjects may exercise in relation to their data.

The controller is the EO. The joint controller is the European Parliament which sends by email to the EO a monthly report (per quarter with monthly consumption) of the telephone consumptions for each staff member.

### 1. What personal data will the European Ombudsman process?

We process the following personal data:

- name and surname;
- phone numbers (business telephone number, professional mobile telephone number);
- monthly telephone consumption (number of calls, total duration, total cost).

### 2. Why does the European Ombudsman process these personal data?

The purpose is to manage the billing of telephone consumptions by the European Parliament to the European Ombudsman.

### 3. What are the legal bases and necessity for processing this data?

Processing is necessary on the basis of Article 5(1)(a) (the performance of a task carried out in the public interest) and 5 (1) (b) (compliance with a legal obligation to which the controller is subject) of Regulation 2018/1725.

The legal basis are the [administrative cooperation agreement between the Secretary General of the European Parliament and the EO of 15 March 2006](#) and the [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 \("Financial Regulation"\) and its implementing rules](#).



#### **4. Who is responsible for processing the data?**

Data is processed by the Unit Personnel, Administration and Budget (PAB)-Sector Finances.

#### **5. Who will be recipients of the data?**

The EO, the Secretary General and the members of PAB Unit- Finances sector.

#### **6. How long will the data be kept?**

Data collected by the EO (paper files) for processing the reimbursement of the costs (payment order in the IT tool ABAC) are stored in locked cupboards for 5 years after the discharge procedure. The Excel file that shows the consumption of the current year is kept in those paper files. Only the hard copy of the debit note, without personal data, is stored in the physical archive.

#### **7. How do we protect your data?**

Data collected by the EO (paper files) for processing the reimbursement of the costs are stored in locked cupboards. The EP's email sent to the Head of PAB Unit and to the functional mailbox containing the monthly report on the telephone consumptions is deleted directly afterwards. Only the members of the Finances sector have access to the functional mailbox.

#### **8. What are your rights and how can you exercise them?**

You have the right of access to your own personal data and to relevant information concerning how the EO uses it.

You have also a right to request rectification of any incomplete or inaccurate data concerning you. You can rectify identification data at any time. You have a right to object to the use of your data by the EO on grounds relating to your particular situation, at any time. Under certain conditions, you have the right to ask that the EO deletes your personal data or restrict its use.

The EO will reply to your requests as soon as possible and within one month at the latest.

#### **9. Who to contact in case of queries or complaints concerning data protection issues?**

At any time, you may send data protection related questions concerning the management of the billing of telephone consumptions to the European Ombudsman, at the following address:



European Ombudsman  
1 avenue du Président Robert Schuman  
CS 30403  
F-67001 Strasbourg Cedex  
[EO@ombudsman.europa.eu](mailto:EO@ombudsman.europa.eu)

You also may contact the Data Protection Officer of the EO office at the following address: [DPO-Euro-Ombudsman@ombudsman.europa.eu](mailto:DPO-Euro-Ombudsman@ombudsman.europa.eu)

You may lodge a complaint with the European Data Protection Supervisor at any time at the following address: [EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)