



Secretary General

Personnel, Administration and Budget Unit

European Ombudsman

Public record of processing activity¹:

Financial transactions in the European Ombudsman's Office

1. Last update of this record: 28.08.2020

2. Reference number²: 18/2020

3. Name and contact details of the controller³: European Ombudsman (EO), 1 avenue du President Robert Schuman, CS 30403, 67001 Strasbourg Cedex

Contact of the responsible department: Personnel, Administration and Budget (PAB) Unit- Finance sector- e-mail: EOinvoice@ombudsman.europa.eu

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

5. Name and contact details of the processor⁴: N/A

6. Name and contact details of the joint controller(s)⁵: European Commission (EC)- 1) DG "BUDGET" which manages ABAC, the accounting system set up by the EC and used by the EO to monitor the execution of its budget and to prepare its accounts and 2) DG "DIGIT" which implements and maintains ABAC- contact: DIGIT-SYSPEP2@ec.europa.eu

7. Purpose(s) of the processing⁶: The purpose of this process is to monitor the execution of the EO budget and to prepare its accounts.

¹ 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>

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

³ Use functional mailboxes as far as possible to ensure business continuity.

⁴ 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).

⁵ 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.

⁶ 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).



Short description: All transactions are supported by ABAC.

The financial transactions are composed of: 1) budgetary commitments: the transaction by which the EO earmarks funds to cover one or more future expense and recorded in ABAC; 2) payments that consist in transferring a financial amount to an external provider (ex: tenderers) or a staff member's bank account; 3) transfers between budget lines (if applicable).

8. Description of the categories of data subjects and of the categories of personal data⁷:

- Categories of data subjects: every individual/contractor who receives a payment from the EO: staff members from the EO Office (officials, temporary and contract agents, seconded national experts and trainees); external suppliers, tenderers.

- Data categories: All data is kept in ABAC

- Name, first name;
- Gender, nationality, title, function;
- Contact information (e-mail address, business telephone number, mobile telephone number, postal address, company and department, country of residence, internet address);
- Bank account reference (IBAN and BIC codes),
- VAT number;
- national insurance number;
- ID card/Passport number and personal number;
- place and date of birth

9. Time limit for keeping the data and, where possible, for erasure⁸: Files relating to financial transactions (supporting documents in PDF used in the verification and validation process) are kept for 7 years and until the end of a possible audit, if it started before the end of the above period. Once the legal deadline has expired, the files are deleted.

10. Recipients of the data⁹:

The EO and the Secretary General as authorising Officers, the Head of PAB Unit, the Head of Finance sector, the staff members from the Finance sector dealing with ABAC (operational initiating agents and ex-ante controllers), Heads of Units/Sectors concerned by the financial procedure, the ABAC system's operators at the EC.

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

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

⁸ 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).

⁹ 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).

¹⁰ 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).



12. General description of security measures¹¹: Data are stored in the EC data centre in Luxembourg and are therefore protected by a number of measures introduced by the DG DIGIT to protect the integrity and confidentiality of the EC electronic products. Access to personal data is protected by means of access rights, which are strictly limited in accordance with the "need to know" principle and are based on the duties entrusted to access holders.

Paper files are kept in locked cupboards in the offices of the staff members from the Finance sector. Electronic files are stored in a specific folder on the file system and only accessible to the Head of PAB Unit and the Finance sector.

13. Information on how data subjects can exercise their rights of access and rectification, and where applicable, of erasure, restriction and data portability¹²:

Data subjects have the right to access their personal data and to rectify them in case their personal data are inaccurate or incomplete. Where applicable, they have the right to erase their personal data and to restrict the processing of their personal data. They have the right to object to the processing of their personal data, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to their particular situation. They may ask the EO information concerning the processing of their personal data by e-mail (EOinvoice@ombudsman.europa.eu). Requests from data subjects will be dealt within one month. They may also contact the Data Protection Officer any time: dpo-eo-ombudsman@ombudsman.europa.eu. If they wish to complain about the Ombudsman's handling of their personal data, they may contact the European Data Protection Supervisor: www.edps.europa.eu]

¹¹ 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>

¹² 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>



Privacy Statement

relating to the financial transactions in the European Ombudsman's Office

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 Commission (EC)- Directorate General (DG) "BUDGET" which manages ABAC, the accounting system set up by the EC and used by the EO to monitor the execution of its budget and to prepare its accounts; and DG "DIGIT" which implements and maintains ABAC.

1. What personal data will the EO process?

We process the following personal data of every individual/contractor who receives a payment from the EO: staff members from the EO Office (officials, temporary and contract agents, seconded national experts and trainees); external suppliers, tenderers:

- Name, first name;
- Gender, nationality, title, function;
- Contact information (e-mail address, business telephone number, mobile telephone number, postal address, company and department, country of residence, internet address);
- Bank account reference (IBAN and BIC codes),
- VAT number;
- national insurance number;
- ID card/Passport number and personal number;
- place and date of birth.

2. Why does the EO process this personal data?

The purpose of this process is to monitor the execution of the EO budget and to prepare its accounts.



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

The processing of the data is based on the Financial Regulation and its implementing rules.

Processing is necessary for the performance of a task carried out in the public interest, for compliance with a legal obligation to which the controller is subject and for the performance of a contract to which the data subject is party in order to take steps at the request of the data subject prior to entering into a contract (article 5(1) a, b and c of Regulation 2018/1725).

4. Who is responsible for processing the data?

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

5. Who will be recipients of the data?

The EO, the Secretary General, the Head of PAB Unit, the Head of Finance sector, the staff members from the Finance sector dealing with ABAC (operational initiating agents and ex-ante controllers), Heads of Units/Sectors concerned by the financial procedure, the ABAC system's operators at the EC.

6. How long will the data be kept?

Files relating to financial transactions (supporting documents in PDF used in the verification and validation process) are kept for 7 years and until the end of a possible audit, if it started before the end of the above period. Once the legal deadline has expired, the files are deleted.

7. How do we protect your data?

Data are stored in the EC data centre in Luxembourg and are therefore protected by a number of measures introduced by the DG DIGIT to protect the integrity and confidentiality of the EC electronic products. Access to personal data is protected by means of access rights, which are strictly limited in accordance with the "need to know" principle and are based on the duties entrusted to access holders.

Paper files are kept in locked cupboards in the offices of the staff members of the Finance sector. Electronic files are stored in a specific folder on the file system and only accessible to the Head of PAB Unit and the Finance sector.

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 financial transactions at the EO, at the following address:

European Ombudsman
1 avenue du Président Robert Schuman
CS 30403
F-67001 Strasbourg Cedex
EOinvoice@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

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