

## EDPS record of processing activity

Record of EDPS activities processing personal data, 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 (hereinafter ‘the Regulation’).

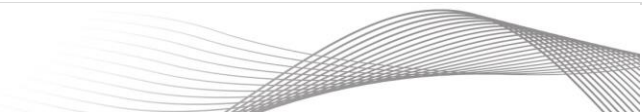
Nr.	Item	Description
	<b>Use of Corporate Credit Card by Staff</b>	
	Last update of this record	<b>20/01/2022</b>
2.	Reference number	<b>57</b>
<i>Part 1 - Article 31 Record (specific legal obligation to publish – see Article 31(5))</i>		
3.	Name and contact details of controller	<p>The <a href="#">European Data Protection Supervisor (EDPS)</a> is the <b>controller</b> with regards to the internal procedure related to the request of the card and the control on the compliance with the related procedure.</p> <p><b>Postal address:</b> Rue Wiertz 60, B-1047 Brussels  <b>Office address:</b> Rue Montoyer 30, B-1000 Brussels  <b>Telephone:</b> +32 2 283 19 00  <b>Email:</b> <a href="mailto:edps@edps.europa.eu">edps@edps.europa.eu</a></p> <p>Responsible department or role:            Human Resources, Budget, Administration (HRBA) Unit: <a href="mailto:EDPS-MIPS@edps.europa.eu">EDPS-MIPS@edps.europa.eu</a></p> <p>Contact form for enquiries on processing of personal data to be preferably used:  <a href="https://edps.europa.eu/node/759">https://edps.europa.eu/node/759</a></p> <p>Lufthansa AirPlus Servicekarten GmbH (‘AirPlus’) is a <b>separate controller</b> for the procedure concerning the financial transactions and the relationship with the different service providers involved. The processing operations directly managed by AIRPLUS</p>



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		<p>concern the check on anti- money laundering and terror prevention, the credit worthiness check, credit limit and other specific procedures.</p> <p>For more information on personal data being processed by AirPlus please refer to its specific privacy statement, which will be provided once the applicant receives the online application link as mentioned above.</p> <p>Contact AirPlus  Dornhofstraße 10  63263 Neu-Isenburg, Deutschland/Germany  <a href="http://www.airplus.com">www.airplus.com</a>  Email: <a href="mailto:dataprotection@airplus.com">dataprotection@airplus.com</a></p>
4.	Name and contact details of DPO	<a href="mailto:DPO@edps.europa.eu">DPO@edps.europa.eu</a>
5.	Name and contact details of joint controller (where applicable)	n/a
6.	Name and contact details of processor (where applicable)	n/a
7.	Short description and purpose of the processing	<p><u>Short description :</u></p> <p>In the framework of Mission management, the EDPS staff can request corporate credit cards, which will be provided by a financial organisation, namely, Lufthansa AirPlus Servicekarten GmbH ('AirPlus').</p> <p>Credit cards are intended to be used mainly for business-related payments and more specifically to pay costs related to missions undertaken by staff on behalf of the EDPS. It would also allow for payment of personal expenses such as for instance medical expenses while waiting reimbursement. The product allows the EDPS to expedite and facilitate travel expense management to employees.</p> <p>Each EDPS staff member, having a contract of at least one year can apply for a credit card by contacting the HRBA Unit, which has the sole authority to make requests for a card on behalf of staff. Applications can be sent by email to EDPS-MIPS.</p>



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		<p>The procedure in brief:</p> <ul style="list-style-type: none"> <li>• after application, the applicant will receive an email from AirPlus with a link (valid for 30 days) to the online application with their privacy statement attached/linked.</li> <li>• When applying for a credit card, the staff member will be asked to provide certain information (such as the address and salary ceiling).</li> <li>• The process consists of two steps: <ul style="list-style-type: none"> <li>- The first step is to provide data in a form. Once done, you will receive a code and an invitation to verify your identity online.</li> <li>- The second step is the online identification</li> </ul> </li> </ul> <p>No copies of the requests are kept by the relevant persons within HRBA. Only a notification is sent to the HRBA Unit, which states that a staff member applies for a credit card. This notification is kept in the personal file of the staff member.</p> <p><u>Purpose</u> :</p> <p>Your personal data are processed in order to enable the EDPS staff to obtain and use a corporate credit card for costs payments related to missions undertaken by staff on behalf of the EDPS and for reimbursement (e.g. for medical expenses.)</p>
8.	Description of categories of persons whose data the EDPS processes and list of data categories	<p>All EDPS staff : All statutory staff with at least one year contract and also Seconded National Experts.</p> <p>Personal data processed by the EDPS include: name, address, work email, amount of expenses, supporting documents (including: invoices, confirmation of reservation of plane ticket or privately hired car, train tickets, transfer tickets to and from airport, etc.), email exchanges with the agreed Travel Agency).</p> <p>Personal data, as described above, are collected directly from the data subjects applying or using a credit card.</p> <p>Personal data processed by AirPlus include:</p> <ul style="list-style-type: none"> <li>• Personal data processed via the application form, such as, name of the employer, staff name, address, staff ID, address, salary ceiling gender, data of birth, nationality, mobile number;</li> </ul>



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		<ul style="list-style-type: none"> <li>• Purchases made with the credit card, technical information and the transaction itself, information on the merchant where the card was used, card number, the expiry date, security number on the back of the card and the credit limit associated with the card.</li> <li>• As provided in AirPlus' privacy statement, in order to evaluate your credit worthiness, AirPlus <i>'may collect additional third-party information on you and process it [...]. This information is collected from credit rating agencies and/or official sources such as banks.'</i></li> </ul> <p>As provided in AirPlus' privacy statement, <i>'AirPlus does not collect all Corporate Card Data from you directly, but receives your personal data from third parties (in particular the Subscriber and Travel Service Providers).'</i></p> <p>For more information on personal data being processed by AirPlus please refer to its specific privacy statement.</p>
9.	Time limit for keeping the data	<p>The data collected for mission management are kept as a rule for a maximum of seven (7) years. Once the legal deadline has expired, the file is deleted.</p> <p>As provided in AirPlus' privacy statement, <i>'personal data will be saved to the extent to which and for those periods of time for which AirPlus is legally required to do so. [...]</i> According to these laws, retention periods can be up to ten years.'</p>
10.	Recipients of the data	<p>The only persons that can access the data on behalf of the EDPS are the members of staff of the HRBA unit dealing with missions, only for the part of the procedure that is managed by EDPS staff, i.e. enrolment and control of compliance with the procedure.</p> <p>Under strict rules of confidentiality, data held by AirPlus may be disclosed to the following categories of service providers: IT service providers (hosting and infrastructural services), transaction-related service providers (receipt processing services) and customer relationship service providers (call center services).</p> <p>As provided in AirPlus' privacy statement, all the service providers are located in 'Europe'. In specific cases, data might be disclosed to administrative and financial authorities.</p>



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11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<p>Personal data are being transferred <b>outside of EU and EEA by Lufthansa AirPlus</b>.</p> <p>As provided in Lufthansa AirPlus' privacy statement, <i>'AirPlus will forward your personal data only to fulfil the respective business purpose, if mandated by law, or to service providers which have been contracted by AirPlus and are obligated to comply with applicable data protection regulations. [...] AirPlus shares your data under strict confidentiality obligations with the following categories of service providers [located in Europe]: IT service providers (hosting and infrastructure services), transaction-related service providers (receipt processing services); customer relationship service providers'</i>. Information is also exchanged with merchants with a view to authorise the transaction and pay for the purchased goods.</p> <p>As provided in AirPlus' privacy statement, <i>'Corporate Card Data will be transferred to countries outside the European Union or the European Economic Area ("third countries") only to the extent required for the respective purpose (e.g., enabling transactions or reports to Subscribers) or mandated by law (e.g., reporting duties stipulated by tax laws). Prior to any transfer of personal data to processors or third parties in third countries, AirPlus ensures that a transfer mechanism pursuant to GDPR is in place (e.g. the Model Clauses for the transfer of personal data to third countries provided by the European Commission).'</i> For more information, please refer to the Lufthansa AirPlus' privacy statement.</p> <p><i>Transfers of the travel agency within its 'corporate family' are based on Art. 48(2)(d) of the Regulation (EU) 2018/1725 - Binding Corporate Rules (BCRs).</i></p> <p><i>Transfers are also based on Article 50(1)(b) of the Regulation (EU) 2018/1725, since 'the transfer is necessary for the performance of a contract between the data subject and the controller [...]'.</i></p>
12.	General description of security measures, where possible.	The data collected for mission management are kept as a rule for a maximum of seven (7) years. Once the legal deadline has expired, the file is deleted. To avoid circulation of the information, the possibility to have access to these data is restricted to EDPS staff dealing with missions on the basis of a strict need to know principle.
13.	For more information, including how to exercise your rights to access,	DPN published on the EDPS intranet.



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	rectification, object and data portability (where applicable), see the data protection notice:	The DPN of EDPS' Missions Management is available internally. <i>Link to MIPS/EC missions data protection notice:</i> available in the EC record: <a href="#">DPR-EC-00990.2</a> .