

EDPS Record of Processing Activity

Nr.	Item	Description	Document info
		Financial transations	
1.	Last update of this record	17.12.2025	
2.	Reference number	13	Roles & Contact Details
3.	Name and contact details of controller	<p>European Data Protection Supervisor (EDPS) Postal address: Rue Wiertz 60, B-1047 Brussels Office address: Rue Montoyer 30, B-1000 Brussels Telephone: +32 2 283 19 00 Email: edps@edps.europa.eu</p> <p>Delegated controller: HRBA Unit, EDPS-Finance@edps.europa.eu</p> <p>Contact form for enquiries on processing of personal data to be preferably used: https://www.edps.europa.eu/about-edps/contact_en</p>	
4.	Name and contact details of DPO	dpo@edps.europa.eu	

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5.	Name and contact details of joint controller (where applicable)	<p>European Commission (EC) - DG BUDG</p> <p>DG BUDGET manages ABAC and the central European Commission's Accounting System (SUMMA), the financial and accounting applications set up by the Commission, to monitor the execution of its budget and to prepare its accounts. Until end 2027, the Commission will have these two parallel systems working with the same personal data. After the transition, as of 2028, ABAC will be decommissioned.</p> <p>EDPS and DG BUDG are joint controllers for the following processing activity: registration and related financial transactions of Business Partners (legal entities and bank account records) in SUMMA. For more information, see the EC record (DPR-EC-00301) and privacy statement.</p>
6.	Name and contact details of processor (where applicable)	<p>1. EC-DG BUDG for ABAC and SUMMA: DG BUDGET manages ABAC and SUMMA, which are the financial and accounting applications set up by the Commission, to monitor the execution of its budget and to prepare its accounts. DG BUDG is a processor for all data processing in ABAC and SUMMA, except for processing activities where joint controllership has been established (see above).</p> <p>2. ERCEA for SPEEDWELL: SPEEDWELL is a paperless workflow tool developed by the European Research Council Executive Agency (ERCEA). The application can be seen as an extension of ABAC and SUMMA, allowing the electronic circulation of invoices between all actors involved in a payment and commitment process.</p>

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7.	Short description and purpose of the processing	<p>The purpose of this process is to implement the budget of the EDPS.</p> <ul style="list-style-type: none"> • Budgetary commitments/ Fund Reservations/Purchase orders: the transaction by which the EDPS earmarks funds to cover one or more future expense. It is recorded in the ABAC and/or SUMMA system (Financial transactions ICT environment of the EC). • Payments: the operation that releases the EDPS from an obligation to a creditor. A payment consists in transferring a financial amount to an external provider or a staff member's bank account. As the EDPS does not have its own bank account, these payments are done through the European Commission treasury services. • Recovery Orders: When the EDPS has made a payment in excess, it must recover the amount due. This is done via a recovery order. The Authorising Officer must validate the existence of the debt before issuing the recovery order. • Forecast of Revenue: the forecast of revenue (FoR) is a possible preliminary step in the recovery process. <p>A Recovery Order must be established if the entitlements are:</p> <ol style="list-style-type: none"> (1) Certain: not submitted to conditions; (2) Of a fixed amount: the exact amount receivable must be known; (3) Due: the amount is due. <p>If these three conditions are not satisfied, there is no entitlement.</p>

Description of processing

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		The debt is qualified as potential, the AO must record an estimate of the amount receivable to be able to do a follow-up.
8.	Description of categories of persons whose personal data is processed and list of data categories	<p>Categories of data subjects</p> <p>We process the following data on every individual/contractor with whom the EDPS enters into a commitment, who receive a payment from the EDPS and/or against which a forecast of revenue or recovery is issued, namely:</p> <ul style="list-style-type: none"> EDPS: the Supervisor and staff members External suppliers (contractors): individual having signed a contract/purchase order with the EDPS. <p>Categories of personal data</p> <p>The personal data processed are the following:</p> <p>Personal data collected via 1/ the Legal Entity / Business Partner Form and supported documents; 2/ the Financial Identification Form as well as the supporting documents provided (i.e. bank statement) include:</p> <p>Name, first name, permanent address, identity card/ passport number or the number of another accepted identity document, personal number (for certain countries), NUP number (Numéro Unique de Personnel/ Unique Personal Number for staff only), PerID (for staff only), date/place/country of Birth, email address, Phone number, payments, bank account number, bank account name, address</p>

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		<p>declared to the bank, copy of ID document, signature, payment currency, bank statement.</p> <p>In case the dunning procedure is initiated, the information on the recovery order, dunning logs including court judgement, bankruptcy order or any relevant dunning related documents.</p> <p>All data are kept centrally (EC's ABAC and SUMMA systems and ERCEA's Speedwell).</p>	Description of processing
9.	Time limit for keeping the data	<p>1/ Natural persons that are not staff / ex-staff / NUP (Numéro Unique de Personnel/ Unique Personal Number) holders: 10 years after last transaction</p> <p>2/ Staff / Ex-Staff and other NUP holders: A maximum of 100 years after the date of recruitment for Commission staff (to satisfy any request that may come in after the end of a staff member's contract or after their retirement).</p> <p>Justification of applicable retention period according to the European Commission documentation (DPR-EC-00301): Natural persons that are not staff / ex-staff / NUP holders: The legal basis for processing personal data is article 75 Financial Regulation (Regulation (EU, Euratom) 2024/2509). According to the applicable provisions, all financial transactions must be retained for five years after the discharge, which occurs two years after the financial transaction. This establishes a minimum legal requirement of seven years for the retention of personal data linked to financial operations. However, DG BUDG considers that, beyond the strict legal minimum, there is a legitimate and proportionate need to retain data for a longer period. In particular, the European Commission has a responsibility to ensure transparency of EU budget implementation and to respond to requests from citizens, journalists, auditors, and other stakeholders regarding financial transactions. In practice, such requests may relate to financial decisions taken</p>	Retention

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		<p>during the previous two Commissions' mandates. Therefore, DG BUDG has assessed that retaining the relevant data for a period corresponding to the duration of two Commission mandates (i.e. up to 10 years) is justified. This retention period is proportionate to the purpose of ensuring accountability, facilitating audit and control activities, and maintaining public trust in the EU's financial governance. It also reflects the need to balance transparency obligations with data protection principles, ensuring that personal data are not kept longer than necessary.</p>	
10.	Recipients of the data	<p>Recipients of the personal data are the following:</p> <ul style="list-style-type: none"> • The EC's ABAC / SUMMA system's operators and internal auditors; • The ERCEA's Speedwell system operators and internal auditors; • The European Parliament, as provider of the EDPS IT infrastructure. <p>Regarding staff data: their personal data are only accessible to those users who have been granted "Confidential" access level with the express written authorisation of their Director-General (for the Commission) or the highest level of hierarchy (for External entities)</p> <p>Personal data might be transmitted to internal audit services, the Court of Auditors or to the European Anti-Fraud Office (OLAF) for audit and fraud investigation purposes.</p> <p>Personal data (i.e. account holder name, address, country, bank account number, the amount of the payment and the payment remittance information) may be disclosed to banking institutions responsible for the execution of the payment to the data subject.</p> <p>In line with Article 38 of the Financial Regulation, personal data may also be disclosed to the general public through the Financial Transparency System (FTS)</p>	Recipients

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		website. In such cases, only a limited set of data is published, —namely the name of the beneficiary, the region, and the amount awarded. This publication is limited to a period of two years after the end of the financial year in which the funds were legally committed. According to the Financial Regulation, only financial commitments above €15,000 will be published, primarily relating and procurement contracts.	Recipients
11.	Are there any transfers of personal data to third countries or to international organisations? If so, to which ones and with which safeguards?	<p>Personal data (account holder name, IBAN, account holder address and amount) is only transferred to financial institutions located in the EU and European Economic Area (EEA) in order to enable payment transactions. However, personal data may be subsequently transferred to other financial institutions outside the EU and EEA in order to enable payment transactions. This is the case when a natural person resides in an area outside the EU or EEA and that the data subject has requested to be paid in a bank which is outside of EU or EEA. Payments could be executed in any country in the world regardless of the compliance of this country with regards to data protection. In this case the only restrictions with regards to payments are the one adopted by the Council of the European Union.</p> <p>Legal basis of transfer, where applicable:</p> <p>1/ Transfer on the basis of the European Commission's adequacy decision (Article 47)</p> <p>2/ Derogations for specific situations (Article 50.1 (a) - (g))</p>	Transfers
12.	General description of security measures, where possible.	<p>- Electronic files stored in a specific folder on the file system and the EDPS Content Management System only accessible to the HRBA Head of Unit and the Finance team</p> <p>- Supporting documents uploaded electronically to the relevant financial operation in ABAC (secured through EU LOGIN).</p>	Security

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		<ul style="list-style-type: none"> - Supporting documents uploaded electronically to the relevant financial operation in Speedwell (secured through EU LOGIN). - ABAC / SUMMA are subject to the security measures provided for in the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission (e.g. authentication and access control measures, additional protections at network level, data integrity controls, security monitoring and periodic backups for potential restores.) 	Security
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	https://www.edps.europa.eu/data-protection/our-work/publications/data-protection-notice-records/2025-12-17-data-protection-notice-financial-transactions_en	Data Protection Notice