



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data.

Processing operation: Registration and related financial transactions of Legal Entity and Bank Account records / Business Partners in the central European Commission Accounting System

Data Controller: BUDG.C3

Record reference: DPR-EC-00301

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1. Introduction

The European Commission (hereafter ‘the Commission’) is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to [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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer (DPO) and the European Data Protection Supervisor (EDPS).

The information in relation to processing operation “Registration and related financial transactions of Legal Entity and Bank Account records/ Business Partners in the central European Commission Accounting System” is presented below.

2. Why and how do we process your personal data?

Purpose of the processing operation:

All financial and contractual transactions undertaken by Commission departments and External Entities using the Central Financial System of the European Commission require the **identification** of a unique Legal Entity record. Similarly, the Commission is collecting Bank Account related data to **execute payments**. Your personal information may be used to collect revenues and/or recover Commission’s claims due protecting the financial interests of the EU.

Therefore, the European Commission and by delegation the Directorate General for Budget (DGBUDG), and in particular **Units BUDG.C3, BUDG.C1, BUDG.C4 and BUDG.D4**, as well as the External Entities¹ using the central financial system of the European Commission, collect and use your personal information **to:**

- validate your legal existence and to ascertain that no double entries exist in the system.
- register all your financial and contractual transactions (including legal commitments, purchase orders, contracts, invoices, payments, credit notes, recovery orders);
- execute payments to the bank account of your choice;
- recover overdue receivable amounts;
- publish information on funds received from the EU budget, where the conditions of Article 38 of the Financial Regulation apply.

Since 1 January 2025, the Commission uses the information system “SUMMA” for the control and follow-up of the accounting and financial transactions of the European Commission and related Executive Agencies. Previously, the Commission was using another accounting and financial system named “ABAC”. This system is still used by the External Action Services and other EU External Agencies. Therefore, until decommissioning of ABAC currently planned for 2028, your personal data may be stored in both systems.

Please note that **in case your personal data is collected by an external entity**, DG BUDG is its joint **controller** along with the External Entity with which you have been in contact, and which has collected your personal data. Both DG BUDG and the external entity jointly ensure compliance with the data protection requirements under service-level agreements, which govern the exact procedures to be followed and the responsibilities of each party. Currently, the central financial system of the Commission is used by approximately 50 external entities (departments, executive agencies, other EU agencies, Joint-Undertakings, etc.) and the role of each has been defined in the joint- controllership agreement that each entity has signed¹.

Your personal data will not be used for an automated decision-making including profiling.

3. On what legal ground(s) and on which legal basis do we process your personal data?

We process your personal data, because the processing is necessary for:

- the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body, in accordance with Article 5(1)(a) of Regulation (EU) 2018/1725, and to Articles 317, 322(1) and 323 of the Treaty on the Functioning of the EU (TFEU) with regard to the implementation of the Union budget, the establishment of the Union’s financial rules and the availability of the Union’s financial means with respect to third parties.
- the compliance with a legal obligation to which the controller is subject, according to Article 5(1)(b) of Regulation (EU) 2018/1725, and of the Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (recast), also referred to as Financial Regulation (FR), and in particular:
 - o Articles 33 up to 38 laying down the rules of sound financial management including registration, retention, publication and deletion of personal data.
 - o Articles 86 and 82(10) laying down the powers and duties of the Accounting Officer with respect to the creation and management of legal entity files and for the keeping of supporting documents.
 - o Article 57 laying down the conditions of the transfer of your personal data to other

¹ External Entities using ABAC-SUMMA under SLA – for example executive agencies, JRC, the European Parliament etc.

institutions.

- Chapter 6 laying down the powers and duties of the Accounting Officer with respect to recovery of due amounts.
- the performance of a contract to which you are party, or to take steps at your request prior to entering a contract, according to Article 5(1)(c) of Regulation (EU) 2018/1725. In case of absence of this processing, no contracts with or financing decisions in your favour could be concluded and no monitoring of the correct execution of these contracts/decisions would be possible.

4. Which personal data do we collect and further process?

To carry out this processing operation, the Data Controller² collects the following categories of personal data:

- the information you have filled in the Legal Entity / Business Partner Form as well as the supporting documents you have provided (e.g. ID document);
- the information you have filled in the Financial Identification Form as well as the supporting documents you have provided (i.e. bank statement).

The personal data includes: the name, first name, permanent address, identity card/passport number or the number of another accepted identity document, personal number (for certain countries), Numéro Unique de Personnel/ Unique Personal Number (for staff only), PerID (for staff only), date/place/country of birth, email address, phone number, legal & budgetary commitments, payments, bank account number, bank account name, address declared to the bank, copy of ID document, signature, bank statement .

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.

5. How long do we keep your personal data?

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for:

- **a maximum of 10 years** after the last transaction for data related to natural persons other than Commission staff;
- **up to 100 years** after the date of recruitment for staff (to satisfy any request that

² In case your personal data is collected by an external entity, DG BUDG is joint controller along with the entity with which you have been in contact, and which has collected your personal data.

may come in after the end of a staff member's contract or after their retirement).

6. How do we protect and safeguard your personal data?

All personal data are stored on the servers of the European Commission. All processing operations are carried out pursuant to the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

To protect your personal data, the Commission has put in place a number of **technical and organisational measures**. These technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed.

Organisational measures include restricting access to the personal data solely to authorised persons according to the “need to know” principle for the purposes of this processing operation. Such access requires the authorization of the user organization's Director General. The accesses granted are reviewed on a regular basis and, in case it is no longer needed, the access to personal data is revoked.

7. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to the **Commission staff** responsible for carrying out this processing operation and to the authorised staff according to the “need to know” principle. This means that only the data used for your **unique identification** (first name, last name, country and date of birth) is accessible by all ABAC-SUMMA users to avoid potential double entries in the system.

Access to the other collected personal data is granted only to the specific staff with a **specific access right profile**. Such access requires the authorization of the user organization's Director General. The accesses granted are reviewed on a regular basis and in case it is no longer needed, the access to personal data is revoked.

All authorised officers of the Commission, European External Action Service, consultative bodies and external entities, which make use of ABAC-SUMMA under service-level agreements and deal with the financial and accounting matters, may have access on “need to know” basis to your data. Your personal data may also be sent to the Internal Audit Service, the Court of Auditors, the Financial Irregularities Panel, the Anti-fraud Office and any other

institution or entity responsible for audits or investigations.

Your personal data may be transferred to banking institutions in order to execute payments as defined in the contract. In case you are requesting a payment to a bank account which is not located in EEA, your personal data will be transferred to the banking institutions of a third country in accordance with Regulation (EU) 2018/1725. The transfer would be based on adequacy decision (Article 47) in absence of which on appropriate safeguards (Article 48) or based on derogations (Article 50(1)(b) and 50(1)(c)). A limited set of information on beneficiaries under direct management will be accessible to the public through the FTS website on Europa.

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) 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. According to the Financial Regulation, only financial commitments above €15,000 will be published, primarily relating to grant and procurement contracts.

The following categories of expenditure are excluded from publication: scholarships, direct support to natural persons most in need, payments to research and development experts, reimbursement of travel and subsistence expenses for experts, and staff-related expenditure.

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

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have the right to object to the processing of your personal data in cases where processing is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their record reference(s) as specified under Heading 10 below) in your request.

9. Contact information

- The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, we would advise you to **contact our joint controller as your first point of contact, namely the department of the institution or agency of the European Union to which you have submitted your personal data and which is responsible for their collection and transmission to DG BUDG.**

Only then, and if needed, contact the European Commission and by delegation the Directorate General for Budget (DG BUDG), and in particular DG BUDG Data Protection Correspondent and Unit “Legal Entities and Bank Accounts Files” via our contact page https://european-union.europa.eu/contact-eu/write-us_en) or via our functional mailbox BUDG-SUMMA-BP@ec.europa.eu and BUDG-DATA-PROTECTION-CORRESPONDENT@ec.europa.eu.

- The Data Protection Officer (DPO) of the Commission

You may also contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) regarding issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

10. Where to find more detailed information?

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: ec.europa.eu/dpo-register. This specific processing operation has been included in the DPO’s public register with the following record reference: DPR-EC-00301.