

EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

1	Title of the processing activity	Processing personal data for purchase requisitions and payments in the Purchase-to-Pay system (P2P)
2	Update of the record (last modification date)	04/01/2024
3	Register reference number	2921
4	Identity and contact details of the Data Controller Joint Controller (if applicable) Data Processor (if applicable)	European External Action Service Rond Point Schuman 9A, 1046 Brussels, Belgium Data Controller contact entity: RM.BHR.6 - Support to Delegations Supported by RM.SCS.2 - Public Procurement, Contracts and Finance Functional mailbox: support-to-delegations@eeas.europa.eu
5	Identity and contact details of the Data Protection Officer	EEAS Data Protection Officer (DPO): Emese Savoia-Keleti. SG.AFFGEN.DPO Functional Mailbox of the DPO: DATA-PROTECTION@eeas.europa.eu
6	Purpose of the processing activity	<p>Purpose(s): The objective of the processing is to automate the handling and processing of purchase requisitions, including operational initiation and verification and thus to increase efficiency and reduce potential errors and to avoid double/triple entries. The system increases the ability to track invoices and automatically send notifications to the system, ensuring that payment is always made on time and allows the finance department to track in real time what is ordered, received, invoiced and awaited. The system is integrated with ABAC.</p> <p>Description: Framework Contracts and Price Catalogues, including suppliers, are loaded in the system. When RM.BS4 or RM. BS.3 makes an order, they will make an order based on the catalogue price list. A user validates the framework contract updates and a versioning mechanism is in place. The contract management module will create the budgetary commitment and as soon we receive the invoice with that contract number for that commitment, it will be matched into P2P. For both invoicing xml and pdfs, P2P recognizes the order number or the order contract number. If the contract number or order number is recognized, then in P2P it will match the order or commitment/s of that the contract with the invoice. When receiving the delivery, the receipt is to be signed off indicating that the good are delivered. The delivery sheet has to be uploaded but this is optional., we are able to upload the delivery sheet as evidence that the goods are well received. If the supplier is configured as 3 way match in P2P, no invoice will be paid if the good are not received. We can configure the supplier s 2 way match and it is possible to pay the invoice without the delivery. If the invoice is in accordance with the order, and the amount is below a specific threshold, the payment can be fully automated if the receipt was signed off. Timesheets can also be a basis for confirming delivery and executing the payment. There is an opportunity to appoint a group of people to look at the files coming in. The out of office function enables reallocation of files to another person. Approved payments will then be uploaded to ABAC.</p>

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7	Legal basis and lawfulness	<p>Data processing is lawful under article 5(1)a, Article 5(1)b and Article 5(1)c of Regulation (EU) 2018/1725: necessary for the management and functioning of the EEAS and to comply with the rules of sound financial management below as well as to execute the contract between the EEAS and the supplier.</p> <p>Legal reference:</p> <ul style="list-style-type: none"> Regulation (EU, EURATOM) No 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, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012, Financial Regulation, in particular Title V – Common rules, Title VII – Procurement and concessions and Annex I – Procurement <p>Further legal reference:</p> <ul style="list-style-type: none"> Council Decision of 26 July 2010 establishing the organisation and functioning of the EEAS (2010/427/EU) – OJ L 201, 3/8/2010, p. 30.
8	<p>Categories of individuals whose data is processed</p> <p>- Data subjects</p>	<p>Suppliers if they are individuals</p> <p>Contact persons of suppliers</p> <p>Signatories of contracts</p> <p>Employees or individual subcontractors of providers who provide timesheets</p> <p>Users: Responsible user, OIA, OVA, managers (AOS)</p> <p>Other persons appearing on the scanned documents (delivery notes, invoices)</p>
9	Categories of data - Data processed	<p>Suppliers, contact persons, signatories of contracts:</p> <ul style="list-style-type: none"> Name Contact data (like address, phone number, e-mail) Contract, delivery and invoicing data (like bank account or deliveries) Data on the Legal Entity Forms and Bank Account Files <p>Providers of timesheets:</p> <ul style="list-style-type: none"> Name Times worked <p>Users:</p> <ul style="list-style-type: none"> Name Login data (ID, login times) Activity data (approvals, rejections) <p>Other persons appearing on the scanned documents:</p> <p>Data on the documents like name, position, contact data, signature are only on the documents and not processed further.</p>

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10	Recipients of data – Access to data	<p>Assigned staff of the EEAS in charge of managing contracts, of ordering, approving deliveries and of payments;</p> <p>Assigned staff of the EEAS in charge of internal audit controls and legal matters;</p> <p>Assigned staff from the Institutions or bodies charged with a monitoring, audit or inspection task in conformity with the European Union law. e.g.: staff of European Anti-fraud Office (OLAF), European Public Prosecutor's Office (EPPO), Investigatory and Disciplinary Office (IDOC), Internal Audit Services (IAS), European Court of Auditors (ECA), the Legal Service of the European Commission (also hereinafter Commission) as well as staff of other General Directorates (DGs) of the European Commission (Secretariat General, DG Budget and clearinghouse) and of other EU institutions upon request necessary in the context of official investigations or for audit purposes (e.g. internal audits, Financial Irregularities Panel referred to in Article 93 of the Financial Regulation, Exclusion Panel referred to in Article 143 of the Financial Regulation, OLAF);</p> <p>Assigned staff of the European Commission Directorate General for Budget (DG BUDG) with regard to the Legal Entity Form (LEF) and Bank Account File (BAF).</p>
11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	N/A
12	Time limit for keeping the data - Retention period	<p>Data are kept according to the legal rules governing procurement:</p> <ul style="list-style-type: none"> Files relating to tender procedures, including personal data, are to be retained in the service in charge of the procedure until it is finalised, and in the archives for a period of 10 years following the closure of the contract in conformity with the Common Commission-Level Retention List (SEC(2019)900 second revision) as part of the e-Domec policy. However, requests to participate and tenders from unsuccessful tenderers have to be kept only for 5 years following the closure of the contract. Files related to implementation of contracts are kept by the EEAS or EU Delegation and by the data processor (contractor) for up to 10 years from the date on which the European Parliament grants discharge for the budgetary year to which the data relates (end of the contract). Files could be retained until the end of a possible audit if one started before the end of the above periods. After the periods mentioned above have elapsed, the files containing personal data are sampled and sent to the historical archives of the EEAS for further conservation, as applicable. The non-sampled files are destroyed.
13	Data Storage	<p>Data are stored in the Purchase to Pay application on secured servers of the EEAS.</p> <p>Scanned documents are stored on secured drives in the EEAS data centre.</p>
14	General description of security measures	please see above

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15	Rights of individuals	<p>Data subjects have the right of access to their personal data and the right to correct any inaccurate or incomplete personal data. The right of rectification can only apply to factual data processed. Under certain conditions, data subjects have the right to ask the deletion of their personal data or restrict their use as well as to object at any time to the processing of their personal data on grounds relating to their particular situation.</p> <p>The EEAS will consider the request, take a decision and communicate it to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary. Data subjects are informed in the Privacy Statement that they can find more information in Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725.</p> <p>In specific cases, restrictions under Article 25 of the Regulation may apply. If data subjects have questions concerning the processing of their personal data, they may address them to the Data Controller via the functional mailbox: support-to-delegations@eeas.europa.eu</p>
16	Information to data subjects	<p>A specific Privacy Statement is available for data subjects on the intranet.</p> <p>The Privacy Statement is also attached to related communication.</p>