



EUROPEAN COMMISSION

Innovation and Networks Executive Agency

RECORD OF PERSONAL DATA PROCESSING ACTIVITY

In accordance with Article 31 of the [Data Protection Regulation for EUIs](#)¹ (hereinafter referred to as the Regulation), individuals whose personal data are processed by the Innovation and Networks Executive Agency (hereinafter referred to as INEA or Agency) in any context whatsoever are to be protected with regard to the processing of personal data and the Agency has to keep records of their processing activities.

Record No: 2020-006/DO-HOR-02
Created on (date): 1/11/2019
Last update (date): 19/03/2020

NAME OF THE PROCESSING ACTIVITY

Preparation of accounting entries for staff salaries, execution of payments/recoveries to/from INEA staff, vendors, experts and beneficiaries. Accounting management and annual closure.

GROUND FOR THE RECORD:

- Regularisation of a data processing activity already carried out
This record replaces notifications HOR-2 and HOR-3 issued under the repealed Data Protection Regulation 1045/2001
- Record of a new data processing activity prior to its implementation
- Change of a data processing activity (e.g.: update of a record).

¹ Regulation (EU) 2018/1725 of 23 October 2018

1. MANDATORY RECORD UNDER ARTICLE 31 OF THE REGULATION

1.1. Name and contact details of controller

- a. INEA Director's Office – Accounting Sector
Chaussée de Wavre 910
W910 04/060
BE – 1049 Brussels
- b. the Director
- c. Email: inea@ec.europa.eu

1.2. Name and contact details of the Data Protection Officer (DPO)

INEA DPO

INEA-DPO@ec.europa.eu

1.3. Name and contact details of joint controller (where applicable)

Not applicable

1.4. Name and contact details of processor (where applicable)

ING Belgique S.A.

Business Branch Institutionals
avenue Marnixlaan, 24
1000 Brussels

1.5. Purpose of the processing

The purpose of the processing is twofold:

- To control and execute payments/recoveries to/from INEA staff, vendors, experts and beneficiaries;
- To manage the Agency's accounting and undertake the annual closure of INEA.

All payment orders are prepared and validated by the authorising officer (AOS). The accounting team checks the correctness of legal entity forms and bank accounts to ensure that payments are sent to the right entity. This task is performed for all administrative payments and a sample of operational payments, as part of the accounting quality programme. Execution of payments and recoveries are necessary for the implementation of the activities of the Innovation and Networks Executive Agency (INEA).

With regard to the payment of salaries of INEA staff, the accountants download from NAP Infoview (software managed by PMO and containing information about the financial aspect of the payroll) necessary data so that payments can be introduced in ABAC. This information includes: individual payment slips, amounts to be recovered from salaries, list of staff with children using the childcare facilities, list of the bank accounts of staff, grades. With regard to the management of the Agency's accounting and annual closure, the accounting team obtains information about the untaken leaves of the individual staff members at the end of the year for accounting purposes.

1.6. Legal basis for the processing

Lawfulness: Article 5(1)(a), (b) and (c) of Regulation 2018/1725:

- (a) 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;
- (b) processing is necessary for compliance with a legal obligation to which the controller is subject;
- (c) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

The relevant legal basis encompasses:

- Council Regulation (EC) No 58/2003 of 19 December 2002 laying down the statute for executive agencies to be entrusted with certain tasks in the management of Community programmes;
- Commission Decision 2013/801/EU of 23 December 2013 establishing the Innovation and Networks Executive Agency and repealing Decision 2007/60/EC establishing the Trans-European Transport Network Executive Agency as amended by Decision 2008/593/EC;
- Commission Decision C(2013)9235 of 23 December 2013 delegating powers to INEA with a view to the performance of tasks linked to implementation of the Union programmes in the field of transport, energy, telecommunications infrastructure and in the field of transport and energy research and innovation, comprising in particular implementation of appropriations entered in the general budget of the Union;
- Commission Regulation 1653/2004, of 21 September 2004, on a standard financial regulation for the executive agencies pursuant to Council Regulation 58/2003 laying down the Statute for executive agencies to be entrusted with certain tasks in the management of Community programmes amended by Commission Regulation 1821/2005 and by Commission Regulation 651/2008;
- Regulation (EU, Euratom) 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;
- Commission Decision (EU) 2018/1520 of 9 October 2018 repealing Delegated Regulation (EU) No 1268/2012 on the rules of application of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union;
- The Accounting Rules adopted by the Accounting Officer of the Commission. These rules were initially adopted on 28 December 2004 and modified and developed subsequently;
- The European Commission's consolidation manuals for the 2018 closure exercise.

1.7. Categories of data subjects

Legal entities registered in ABAC: staff, applicants, service/goods providers, experts, beneficiaries of grants.

1.8. Categories of personal data

- Copy of identity document, private address, legal entity form and financial identification form with bank account number and bank details (staff, applicants to vacancies, service/goods providers, experts);
- Information related to pay slips, contract data including untaken leaves, personal allowances (staff members).

1.9. Retention time (time limit for keeping the personal data)

a) Retention period:

INEA applies the principles and retention periods indicated in the Common Retention List of the Commission² by analogy.

Bank statements and other financial documents are processed during the financial year, when they were issued, and until the finalisation of the European Court of Auditors (ECA) audit on the annual accounts. They are kept and archived in paper and electronic format, according to the Commission Retention List, i.e. 10 years after end of audit.

b) Storage period:

INEA applies the principles and retention periods indicated in the Common Retention List of the Commission by analogy. The storage periods are the same as indicated for the retention period in point 1.9 a).

c) Is any further processing for historical, statistical or scientific purposes envisaged, which would go beyond the normal retention period?

Files relating to budget accounts, general accounts, bank accounts and payments, the Agency's annual accounts, management of imprest accounts, the accounting framework and its rules, cash management and the validation of accounting systems are eliminated once the administrative retention period has expired.

1.10. Recipients of the data

- INEA Department Resources (services from units R1, R2 and R4) on a need-to-know basis;
- ING Belgique (the Agency's bank).

In addition, data may be disclosed to public authorities, which are not regarded as recipient but may receive personal data in the frame of a particular inquiry in accordance with Union and Member State law, namely:

- The European Court of Justice or a national judge as well as the lawyers and the agents of the parties in case of a legal procedure;
- The competent Appointing Authority in case of a request or a complaint lodged under Articles 90 of the Staff Regulations;
- OLAF in case of an investigation conducted in application of Regulation (EC) No 1073/1999
- The Internal Audit Service of the Commission within the scope of the tasks entrusted by article 118 of the Financial Regulation and by article 49 of the Regulation (EC) No 1653/2004

² SEC (2019)900/2

- The Court of Auditors within the tasks entrusted to it by Article 287 of the Treaty on the Functioning of the European Union of the EC Treaty and Article 20, paragraph 5 of Regulation (EC) No 58/2003
- The European Ombudsman within the scope of the tasks entrusted to it by Article 228 of the Treaty on the Functioning of the European Union
- The European Data Protection supervisor in accordance with Article 58 of the Regulation (EC) 2018/1725

1.11. Transfers of personal data to third countries or international organisations

Not applicable

1.12. Description of security measures

The personal data processed by the accounting team in hard copy is stored in locked cupboards, and electronically in a protected folder with restricted access. Accountants and IT administrator have access to the folder.

The data in ABAC is managed by the European Commission. The access rights in ABAC are managed according to the Commission's procedures for use of ABAC.

Access to electronic files is protected via the Commission security measures (use of password & ECAS authentication system, etc) under Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

1.13. Data Protection Notice

A Data Protection Notice (DPN) relevant to this data processing activity is available on INEA website. <https://ineanet.inea.cec.eu.int/emop/budget-accounting/accounting>