I.   RECORD OF PERSONAL DATA PROCESSING OPERATION (Article 31 of Regulation (EU) No. 2018/1725)

1.	Name of the processing operation	**Third parties data in the LEF (Legal Entity File) and in the BAF (Bank Account File)**
2.	Reference number/Issue	ETF-DPR-11/Issue 1
3.	Date	18/12/2018
4.	Business owner	The process is jointly owned between: Cécile Beelaerts Head of Finance and Procurement Unit, Administration Department cécile.beelaerts@etf.europa.eu and Martine Smit Accountant, Administration Department martine.smit@etf.europa.eu
5.	Controller	Cesare Onestini Director of the ETF Cesare.Onestini@etf.europa.eu
6.	Joint controller(s)	Commission services (e.g. DG Budget and Accounting officer of the European Commission) for Commission systems used by the ETF (e.g. ABAC)
7.	Processor(s)	Not applicable
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu

9.	Purpose of the processing	The purpose of collecting the LEF and BAF is to register data necessary to establish an accounting position for each third party with whom the European Training Foundation (ETF) has a contractual or financial relation. Legal and bank references for all potential third parties need to be registered before a contractual or financial transaction that concerns them can be initiated and implemented.
10.	Legal basis for the processing	The Financial Regulation of the European Training Foundation (ref. GB/13/DEC/014 dated 20/12/2013), article 50 Powers and duties of the accounting officer, point 1.a, and the Implementing Rules (ref. GB/14/DEC/023 dated 11/12/2014), article 30 Legal entities files.
11.	Categories of data subjects	Third parties can be either natural persons (including staff) or private/ public law bodies. For the purpose of personal data processing, data subjects are all natural persons that have contractual and/ or financial relations with the ETF.
12.	Categories of personal data	**For LEF:** Form to be filled in by third party (data subject): In ABAC, two different account groups (ABAC wording): 1. PRIVATE PERSON - MANDATORY FIELDS Name, Permanent address, Identity card/ passport no., Personal number (for certain countries), Date and place of birth, OPTIONAL, Telephone number, Email address

		2. STAFF MEMBER – MANDATORY FIELDS Name, Permanent address, NUP number, Date of birth, OPTIONAL, Place of birth, Identity card/ passport number, Date and signature **For BAF**: Form to be filled in by third party (data subject): In ABAC: MANDATORY FIELDS Name in which the bank account has been opened , Address declared with the bank (street, number, town, postcode, country), Bank name, Bank branch address (if needed), Bank account number (IBAN if existing), Branch code (for certain countries), Date and signature, OPTIONAL, BIC code, Currency
13.	Time limits for keeping of data	Data are kept for 7 years Documents relating to operations not definitively closed shall be kept until the end of the year following that in which the operations are closed. All personal data recorded in ABAC are retained under the responsibility of the joint controller.

14.	Categories of ETF recipients of data	ETF designated financial actors (initiating agents, operational and financial verifying officers, responsible authorising officers, accounting officer), who have been granted access to the data (electronic and paper files).
15.	Categories of external recipients of data	DG BUDG Production team for the validation of the data, using the supporting electronic documents, after which the information in ABAC is accessible to the ABAC user community (only the data in the fields, not the supporting electronic documents).
16.	Transfers of data to third country or international organisation	Not applicable

17.	Technical and organisational security measures	Original supporting documents are kept in locked cupboards and/ or stored electronically in ETF local management systems. Access to local management systems is limited to authorised actors via user authentication (ID and password). Electronic data in ABAC may be accessed only by authorised actors via user authentication (ID and password). Data in these systems is kept under the responsibility of the joint controller.
18.	Information to the data subject	Provided in the EC privacy statement which applies due to the fact that data processed goes beyond the ETF control. a

II.   COMPLIANCE CHECK AND RISK SCREENING OF PERSONAL DATA PROCESSING OPERATION (Article 26 and 39 of Regulation (EU) No. 2018/1725)

Name of the processing operation	**Third parties data in the LEF (Legal Entity File) and in the BAF (Bank Account File)**
Reference number	ETF-DPR-11/Issue 1
Date	18/12/2018

A.   Compliance check

19.	**Lawfulness** (Legal basis and necessity for processing, point 10) ☐ Necessary for performance of tasks in the public interest attributed by EU or MS legislation ☒ Necessary for the management and functioning of the organisation ☒ Necessary for compliance with legal obligation incumbent on controller ☒ Necessary for performance of a contract to which the data subject is party ☐ The data subject has given consent ☐ Necessary in order to protect the vital interests of the data subject or of another natural person	
20.	**Purpose definition** (Point 9) • Do you list all purposes? • Are the purposes specified, explicit, legitimate? • Where information is also processed for other purposes, are you sure that these are not incompatible with the initial purpose(s)?	• Yes • Yes • Not applicable
21.	**Data minimisation** (Point 12) • Do you really need all data items you plan to collect? • Are there any you could do without?	• Yes • No, however some data required in the forms is not necessary for ABAC validation. The template forms cannot be altered by the ETF.
22.	**Accuracy** (Point 12) • How do you ensure that the information you process about people is accurate? • How do you rectify inaccurate information?	• Data included in the forms is validated against supporting documents. • As the presence of an inaccurate information is signalled, a check is put in place and as applicable relevant rectification is made.
23.	**Storage limitation** (Point 13) • Explain why you chose the storage period(s) mentioned • Are they limited according to the maximum or minimum "as long as necessary, as short as	• In accordance with the ETF Financial Regulation, data shall be kept for five years upon the European Parliament discharge for the relevant budgetary year • As short as possible

	possible"? • In case you only need some information for longer, can you split storage periods?	• Not applicable
24.	**Transparency** (Point 18) • How do you tell people about your processing? • If you do not want to inform people (or only inform them after the fact), consult your DPO	• With privacy statement annexed to LEF and BAF • Not applicable.
25.	**Data subjects rights** (Point 18) • Can people contact you if they want to know what you have about them, want to correct or delete the data, have it blocked or oppose to the processing? • Could there be situations where you would want to refuse e.g. granting access? In case so please describe them	• Yes • Not applicable

B.   Risk screening

26.	**Does the processing involve any of the following?**		
	• Data relating to health, (suspected) criminal offences or otherwise considered sensitive	☐ Yes	☒ No
	• Evaluation, automated decision- making or profiling	☐ Yes	☒ No
	• Monitoring data subjects	☐ Yes	☒ No
	• New technologies that may be considered intrusive	☐ Yes	☒ No
	• Exclusion databases	☐ Yes	☒ No
	• Large-scale processing of special categories of personal data (disease surveillance, pharmacovigilance, central databases for law-enforcement cooperation)	☐ Yes	☒ No
	• Internet traffic analysis breaking encryption	☐ Yes	☒ No
	• Management of personal files	☐ Yes	☒ No
	• Staff evaluation procedures	☐ Yes	☒ No
	• Staff selection procedures	☐ Yes	☒ No
	• Establishment of rights upon entry into service	☐ Yes	☒ No
	• Access control systems	☐ Yes	☒ No
	• Video surveillance	☐ Yes	☒ No

Conclusions

	Actor	Date	Signature
27.	**Business owners** Cécile Beelaerts Head of Finance and Procurement Unit, Administration Department **And** Martine Smit Accountant, Administration Department **Conclusion** No further action required		
	Data Protection Officer: Tiziana Ciccarone / Laurens Rijken **Conclusion** I confirm that no further action is required		
	Data Controller Cesare Onestini, Director of the ETF		