



NOTIFICATION FORM

FOR DATA PROCESSING OPERATIONS

Date of registration: 28.6.2011

Register No: IT6

1. Name of the data processing operation

SI2/ABAC – EEA budget and accounting system

2. Data Controller

Programme or Group: ADS2 / Budget, Finance and Resources

Function: Acting Head of ADS Programme

Contact person: Søren Nielsen, soren.nielsen@eea.europa.eu

3. Description of the processing operation

3.1. Area of activity in which the processing is carried out

SI2/ABAC is the budget and accounting software used by EEA to monitor the implementation of its budget and to establish its accounts. The objectives of the system are twofold: to integrate the accounting and financial management of EEA and to reflect the actual budgetary and financial situation of EEA for a given financial year, providing reports for the attention of the budgetary authority and the Court of Auditors pursuant to the requirements set in Regulation (EC) No 401/2009.

All the various modules that constitute the system process, at different levels, personal data: Legal entity files; bank accounts files; assets; Early warning system (only in ABAC), etc...

Personal data are collected and further processed for the purpose of commitments and payments.

There is no restriction under Article 20 of Regulation (EC) No 45/2001; the processing operation does not require prior checking in accordance with Article 27 of Regulation (EC) No 45/2001.

3.2. Modalities for the processing operation

Manual processing Personal data is entered manually in the system for the purpose of creation, validation and authorisation of transactions.

Automated processing

3.3. Are the Personal data processed by an entity external to EEA ('processor')	
<input checked="" type="checkbox"/>	Yes, the validation of third parties in ABAC will be carried out by DG BUDG
<input checked="" type="checkbox"/>	No with regard to SI2

4. Lawfulness and purpose of the processing	
4.1. Legal basis	
<ul style="list-style-type: none"> o EEA Financial Regulation (Decision EEA/MB/52/15 – written procedure) of 19.12.2008, in particular Title VII. o Council Regulation (EC, Euratom) No 1605/2002 of 25.6.2002 on the Financial Regulation applicable to the general budget of the European Communities (OJ L 248/1 of 16.9.2002) as last amended by Council Regulation (EC, Euratom) No 1525/2007 of 17.12.2007 (OJ L 343/9 of 27.12.2007). o Commission Regulation (EC, Euratom) No 2342/2002 of 23.12.2002 laying down detailed rules for the implementation of the Financial Regulation (OJ L 357/1 of 31.12.2002) as last amended by Commission Regulation (EC, Euratom) No 478/2007 of 23.4.2007 (OJ L 111/13 of 28.4.2007). 	
4.2. Grounds for lawfulness	
<p>The data processing is considered lawful because it is necessary:</p> <ul style="list-style-type: none"> o For the performance of tasks carried out in the public interest on the basis of the Financial Regulation and its implementing rules (Article 5(a) of Regulation (EC) No 45/2001); o To ensure compliance of the data controller with the legal obligations stated in the Financial Regulation and its implementing rules (Article 5(b) of Regulation (EC) No 45/2001); o To take steps prior to entering into a contract with the data subjects (Article 5(c) of Regulation (EC) No 45/2001). 	
4.3. Purpose of the processing	
<p>The budget and accounting system SI2/ABAC is used for the control and follow-up of all accounting and financial transactions of EEA. The system manages all the revenues and expenditures and allows the management of all the necessary related accounting tasks.</p>	

5. Features of the processing operation	
5.1. Categories of data subjects concerned	
<p>All EEA staff members, contracted consultants and any third party receiving payments from EEA (external experts, service providers and beneficiaries of grants)</p>	
5.2. Categories of data	

Personal data of data subjects includes in particular their name (first name and surname), their permanent address, third party number; bank accounts details. Optionally in ABAC, data subjects may provide their contact information (name of their organisation, title and description of their function, telephone and fax number, e-mail address).

6. Retention practice of personal data

Taking into consideration the limited set of personal data registered in SI2/ABAC; the requirement to keep full records for at least 5 years after the discharge decision and the need to maintain information for audits, there is no "deletion" or "rendering invisible" of the personal data after a determined period. For instance, all bank related data are kept without time limit to enable further possible payments to the data subjects and queries on financial and accounting transactions in the framework of an audit. Bank account records are deactivated / blocked when the validation team is informed about the closure of a bank account.

7. Personal data processed for historical, statistical or scientific purposes

Purpose	Categories of data	Storage media
<input checked="" type="checkbox"/> Historical	Personal data contained in supporting documents	<input checked="" type="checkbox"/> Anonymous (where appropriate, see Article 49, paragraph 3 of IR) <input type="checkbox"/> Encrypted
<input type="checkbox"/> Statistical	Not applicable	<input type="checkbox"/> Anonymous <input type="checkbox"/> Encrypted
<input type="checkbox"/> Scientific	Not applicable	<input type="checkbox"/> Anonymous <input type="checkbox"/> Encrypted

8. Recipients or categories of recipients to whom the data might be disclosed

EEA staff members dealing with financial and budget matters who have been granted access to the system in order to be able to initiate and approve payments in favour of the data subjects. In addition, users of the EEA budget and accounting system have consultation access to the data.

The Court of Auditors may be granted access when necessary.

Access to the budget and accounting system is strictly controlled through a unique user login and password.

9. Proposed transfer of personal data to third countries or international organisations

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No transfer of personal data to third countries or international organisation
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10. Information given to the data subjects as described in Articles 11 & 12 of the Regulation (EC No 45/2001)

With regard to the processing of personal data for the purpose of validation of legal entities and bank accounts:

The data subjects concerned are requested to fill in and sign a financial identification form and legal entity form which both refer to a privacy statement providing all the information necessary in pursuance with Article 11 and 12 of Regulation (EC) No 45/2001 (see the Privacy statement for legal entity and bank account available at the following address: http://ec.europa.eu/budget/library/contracts_grants/info_contracts/privacy_statement_en.pdf).

11. Procedures to enable data subjects to exercise their rights (as indicated in Articles 13 to 19 of the Regulation (EC) No 45/2001, i.e. access, rectification, blocking, erasure, objection)

Data subjects are responsible for filling in the identification forms to be submitted to EEA. The identification forms make reference to the privacy statement (see link above) where information is provided to the data subjects on how to verify and modify their personal data.

12. Time limits for blocking and erasure of the different categories of personal data

Categories of data	Blocking	Erasure
Any data asked for	Maximum within 15 working days	Maximum within 15 working days