

<b>01 - Name of processing</b>	<b>Processing of Personal Data in the context of Registering Bank Account File and Legal Entity File</b>
02 - Reference	8
03 - Submission Date	02-05-11
04 - Last update	27-04-20
05a - Controller	TRAMACERE Emanuele
05b - Unit-Sector	Finance and Procurement Unit
05c - Controller's email	HoSFinance&Procurement@era.europa.eu
06 - DPO	DataProtectionOfficer@era.europa.eu 120 Rue Marc Lefrancq, 59300 Valenciennes, France Tel.+33 (0) 32 70 96 500
07 - Name and contact details of joint controller (where applicable)	European Commission. DG BUDGET manages ABAC, the financial and accounting application set up by the Commission, to monitor the execution of its budget and to prepare its accounts. DG DIGIT implements and maintain the accounting IT tool ABAC.
08a - Who is actually conducting the processing? (Article 31.1(a))	The data is processed by ERA (responsible unit) itself
08b - Name and contact details of processor (where applicable)	European Commission Refer to DPO-1256-10 ABAC - Accrual Based Accounting System

## 09 - Purpose of processing

The Agency is using the Commission accounting system ABAC, which includes the centrally validated "Legal Entity File" and "Bank Account File", to make or receive payments.

The Legal Entities File (LEF) records all third parties with which the Agency conducts revenue and expenditure transactions. The Bank Account File (BAF) is a descriptive file containing bank details for all companies, organisations and individuals with which the Agency has financial dealings. Bank account related data are registered in a SWIFT compatible manner.

No transaction may be made for the purposes of implementing the budget unless it involves a legal entity (LE) that has been validated beforehand. It follows that before a bank account (BA) can be recorded in the BAF, a LE must be recorded in the ABAC application: the bank account will be linked to that legal entity.

A LE and/or a BA will not be recorded in the Agency's accounts until the legal entity validation team (LEVT) or the bank account validation team (BAVT) within DG BUDG has validated the authorising department's request, which must be accompanied by the relevant supporting documents.

The validation of the LEF and the BAF is a pre-requisite before any transaction may be made for the purposes of implementing the budget.

Each validated legal entity and bank account record is identified by a unique key.

These keys are used by authorising officers' services when preparing financial and contractual transactions.

Related records in the EC register of the Data Protection Officer: DPO-1256-10 ABAC - Accrual Based Accounting System, DPO-372-6 Validation of Legal Entity records in the LEF, DPO-300-9 Validation of Bank Account Records in the BAF.

## 10a - Data Subjects

The following categories of data subjects can be distinguished: Private person or Staff member  
Private companies represented by natural persons  
Public entities represented by natural persons

10b - Personal data

Bank details : 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

LEF Personal details: name, first name, permanent address, ID card/passport number, date and place of birth, personnel number (for staff only).

11 - Time limit for keeping the data

For audit trail reasons and to permit at all times queries on the past execution of payments, no registered data are deleted from the accounts. The forms and documents you submit are scanned and archived electronically. The original forms and documents are usually included in the payment files and follow the same retention rules.

12 - Recipients of the data

Inside ERA: Authorised agency staff dealing with financial and accounting matters;  
Inside EUIs: DG BUDG's central validation team dealing with financial and accounting matters have access to the data.

Outside EUIs:  
As the Agency is using the European Commission's system SWIFT Network, for executing its payments, your bank particulars will also be sent to this company whenever a payment is made in to the beneficiary.

13 - Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?

N/A

14 - How is data stored? What are the security measures implemented?

The forms and documents sent for central validation of the LEF and BAF are added in the payment file. Electronic data is kept within the ABAC WKFL system

The data collected in the Agency's accounts can be accessed by designated agency staff + staff from the Commission's central services, using a UserID and a Password. A Service Level Agreement guarantees the appropriate confidentiality and the technical and organisational security of the ABAC system, as required by the applicable data protection provisions.

15 - For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable) see the data protection notice

The link to the privacy statement appears on the Legal Entity and Bank Account forms that the data subject is required to complete and sign.  
Data subjects can send an e-mail to [finance@era.europa.eu](mailto:finance@era.europa.eu); ERA will reply as per standard deadlines and procedures in ERA's data protection implementing rules. See the data protection notice available at the ERA website: <https://www.era.europa.eu/content/data-protection#meeting8>

15a - Data subject rights

Right to have access; Right to rectify; Right to restrict of processing; Right to data portability; Right to object; Right to obtain notifications to 3rd parties; Right to have recourse

16 - Legal Basis

Amendment to the Agency's Founding Regulation; Financial Regulation; FINANCIAL REGULATION OF THE EUROPEAN RAILWAY ; Framework Financial Regulation for the Agencies;#21;#Implementing rules;#23

17 - Lawfulness of processing

The data processing is considered lawful under art. 5(a), (b) and (c) of the Regulation (EC) 2018/1725, because it 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,
- for compliance with a legal obligation to which the controller is subject, and
- 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.

18 - Data minimisation

The LEF and BAF information are kept at the minimum required detail in order to execute the payments.

19 - Accuracy

All the information related to the LEF and BAF are checked and validated on the basis of supporting documents that are submitted by the data subjects using the LEF and BAF templates.

20 - Access and other rights of persons whose data is processed

Refer to the privacy statement. Requests are dealt with the deadlines of the relevant applicable procedures.

21 - Special category data

NA

22 - DPIA

23 - Link to the Threshold assessment-Risks

24 - Other related documents