

Cedefop record of processing activity

Record of Cedefop activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No. 45/2001 and Decision 1247/2002/EC.

Nr.	Item	Description
<i>Tax Withholding List</i>		
1.	Last update of this record	21/11/2025
2.	Reference number	RB2025-1948425193-2517
3.	Name and contact details of controller	<u>Cedefop – European Centre for the Development of Vocational Training</u> Postal address: Cedefop Service Post, Europe 123, 570 01 Themi, GREECE Telephone: (+30) 2310 490111 Email: info@cedefop.europa.eu Responsible department or role: Executive Director's Office/ Accountancy accounting@cedefop.europa.eu
4.	Name and contact details of DPO	data-protection-officer@cedefop.europa.eu
5.	Name and contact details of joint controller (where applicable)	N/A
6.	Name and contact details of processor (where applicable)	Internal: Finance service, Accountancy service

		External: An external contractor (accounting or legal firm) may run the procedure required for ensuring payment of withholding tax. Privacy statement in relation to the processing of personal data is applied in such contracts. In the absence of an external contractor staff from finance and accountancy take over this task.
7.	Very short description and purpose of the processing	The purpose is to abide by a legal obligation to withhold 20% or 3% (as appropriate) of the amounts paid to natural persons or legal entities offering technical or consulting services and pay it directly to the tax office. Cedefop as an employer has to abide by the legal obligation towards the Greek state and retain 20% or 3 % (as appropriate) of the amount paid to supplier. The payment of the amount to the Greek tax office must take place before the end of the n+2 month of the date of the invoice concerned. Greek tax system generates specific payment codes for each amount retained. Cedefop's external contractor, or relevant Cedefop staff, should retrieve those amounts and proceed to payment. The legal basis of the procedure is Article 5 (1)(b) of Regulation (EU) 2018/1725, and specific legal basis for the processing of personal data of persons providing services to Cedefop is undertaken for tax withholding purposes, according to the relevant Greek tax legislation.
8.	Description of categories of persons whose data Cedefop processes and list of data categories	Persons: Suppliers offering services of technical or consulting nature (natural persons or/and the representatives of legal entities). Data: Invoice data, as evidenced by the scanned document.
9.	Time limit for keeping the data	The time-limits for storing personal data are as follows: Personal data included in the supporting documents for the accounting system and for the preparation of the accounts referred to in the financial rules shall be kept for maximum ten years from the calendar year that the obligation to pay the withholding tax has been generated.

		The European Commission, DG BUDG, owner of the financial systems ABAC and SUMMA, keeps relevant personal data in the system for a period specified in the Privacy statement published here: https://commission.europa.eu/publications/business-partners-legal-entities-and-bank-accounts_en
10.	Recipients of the data	Recipients of the data processed: - Finance Service - Greek tax authorities - Greek VAT office - IAS - Court of Auditors - external contractor (accounting or legal firm), if any Cedefop's staff internally responsible for audit and review activities, as well as staff of external contractors providing audit and review services to Cedefop, may have access to the personal data collected through this processing operation to the extent necessary for carrying out their activities. If necessary, data could also be provided to OLAF.
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	No transfers outside EU/EEA are foreseen.
12.	General description of security measures where possible.	Cedefop implements a number of technical and organisational security measures to address, among others, online security (firewall, URL filtering, antivirus programs), risk of data loss and alteration (back-up and restore policy), as well as to grant access to its information and documents only to authorised users based on a 'need to know' principle (through authentication and authorisation procedures, encryption). Cedefop has also put in place appropriate incident handling and personal data breaches procedures. Compliance with these measures is ensured through Cedefop's ICT Use and Security Policy, which is regularly reviewed for improvements.

13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	A Privacy Statement is made available to data subjects by publication on the Cedefop web portal.
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