



## **Privacy Statement on the protection of personal data in relation to**

### **VAT Exemption (applicable to Cedefop)**

All personal data are processed in accordance with the provisions 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 No 1247/2002/EC (hereinafter – Regulation 2018/1725).

#### **1. Who is the controller regarding the processing of your personal data?**

The controller is Cedefop and the responsible department is Executive Director's Office/Accountancy.

#### **2. What is the purpose of processing your personal data?**

The purpose of the processing is to ensure a VAT exemption certificate is issued and delivered to supplier for every invoice in due time so that to avoid paying the VAT; to recover VAT paid (where applicable).

#### **3. What personal data are collected and processed?**

The following personal data are processed:

Concerning Greek suppliers of Cedefop: For every invoice received, Cedefop accounting team requests for the relevant VAT exemption certificate to Ministry of Foreign Affairs. This procedure takes place via a dedicated application of the Ministry of Foreign Affairs that have grant access to Cedefop. The data processed and/or VAT exemption certificate contains: the invoice itself (and therefore full data of supplier and goods purchased); name and signature of Cedefop staff approving the VAT exemption request (Director/Deputy Director, or the head of DRS) and member of accounting team.

Concerning non-Greek EU suppliers of Cedefop: The Finance or Accounting service issues a '15.10 form' to which it attaches the invoice related to the request. This document is stamped and initialled by the Executive Director (or Deputy Director, or head of DRS) of Cedefop and is forwarded to the Ministry of Foreign Affairs; by getting approval from the Ministry of Foreign Affairs, become a VAT exemption certificate.

The 'form 15.10' contains the following personal data: name and signature of the Executive Director (or Deputy, head of DRS); name and address and VAT nr of the supplier; information concerning the goods and/or services.

#### **4. What is the legal basis for the processing of your personal data?**

Personal data is processed based on:

Article 5(1)(a) of Regulation (EU) 2018/1725 – 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

## **5. Who has access to your personal data and to whom they are disclosed?**

Access to your personal data is granted to:

### Internal recipients

Finance service, Accountancy service, DRS, Cedefop's staff internally responsible for audit and review activities, as well as staff of contractors providing audit and review services to Cedefop, may access the personal data collected through this processing operation to the extent necessary for carrying out their duties.

### External recipients

Suppliers of Cedefop; Greek VAT office; IAS; Court of Auditors.

## **6. For how long are your personal data kept?**

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 for the calendar year that the obligation to claim the VAT exemption.

## **7. Are there any transfers of your personal data to countries outside the EU/EEA?**

N/A

## **8. What are your rights and how can you exercise them?**

You have the right to request from the controller access to and rectification or erasure of your personal data or restriction of processing.

You also have the right to object to the processing of your personal data.

To exercise the mentioned rights, you may contact the controller by sending an email to: [accounting@cedefop.europa.eu](mailto:accounting@cedefop.europa.eu)

The controller shall provide information on action taken on a request within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

For further inquiries, you may refer to Data Protection Officer of Cedefop ([data-protection-officer@cedefop.europa.eu](mailto:data-protection-officer@cedefop.europa.eu)).

Finally, if you consider your data protection rights have been breached, you may lodge a complaint with the European Data Protection Supervisor as the supervisory authority using a dedicated complaint form: [https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en](https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en) (see further contact information at [https://edps.europa.eu/about-edps/contact\\_en](https://edps.europa.eu/about-edps/contact_en)).

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