

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
Financial Transactions		
1.	Last update of this record	18/11/2025
2.	Reference number	RB2025-1948425193-2523
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 Thessaloniki, GREECE Telephone: (+30) 2310 490111 Email: info@cedefop.europa.eu Responsible department or role: DRS/Finance and procurement Functional email address: info@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)	European Commission - DG BUDG, Unit C.3 - registers Business Partners Identification Forms (previously known as Legal Entity and Bank Account Files) in the Commission's Financial System SUMMA. Contact details may be found on the respective page of DG BUDG: https://commission.europa.eu/publications/business-partners-legal-entities-and-bank-accounts_en

6.	Name and contact details of processor (where applicable)	European Commission – DG BUDG – is the owner of the budget management tools ABAC and its successor SUMMA and provides the maintenance and technical support for ABAC and SUMMA. Contact details may be found on the respective page of DG BUDG: https://commission.europa.eu/publications/business-partners-legal-entities-and-bank-accounts_en The accounting company contracted by Cedefop acts as data processor for external accounting and tax consultancy services. Contact info may be made available upon request to info@cedefop.europa.eu
7.	Very short description and purpose of the processing	The purpose of this processing operation is to implement Cedefop’s budget, as well as to manage and monitor relevant financial transactions, in line with Cedefop’s financial rules (https://www.cedefop.europa.eu/files/rb201901034_cedefop_financial_regulation_2019_f.pdf) The main processes and systems concerned include: 1. ABAC, which is an information system developed and maintained by the European Commission, is used for the control and follow up of the accounting and financial transactions of EU institutions and bodies using it. In ABAC, eligible beneficiaries (third parties) are identified on the basis of structured data as Legal Entities and in relation to their Banking details. The Legal Entity and Bank Account registration process is initiated by Cedefop staff (Finance & Procurement Service staff) and the authorisation is managed centrally by the European Commission. 2. Cedefop keeps internal financial and project files that contain data, including personal data, to support financial management and budget implementation. 3. In terms of processing, Cedefop relies on an external supplier (data processor) for external accounting and tax services notably in relation to VAT exemptions, withholding tax calculations and payments of amounts due to the local Tax Authorities in Greece. 4. In relation to audit and control, Cedefop carries out ex-post controls, internal audits, using own human resources as well as external contractors with relevant expertise and according to professional standards.

		The legal basis of the procedure is Article 5 (1)(a), 5 (1)(b) and 5(1)(c) of Regulation (EU) 2018/1725. As specific legal basis serves the Regulation 2024/2509 of the European Parliament and the Council of 23 September 2024 on the Financial Rules applicable to the general budget of the Union.
8.	Description of categories of persons whose data Cedefop processes and list of data categories	Data subjects: All natural persons that, at one time, have (had) contractual and/or financial transactions with Cedefop. By way of example, Cedefop staff members, seconded national experts, trainees, retired staff members, special advisers, staff of service providers, candidates in staff selection procedures, external experts invited to meetings, financial contributors (e.g. the European Commission), suppliers and individuals having a legal commitment with Cedefop. Data categories: Personal data related to financial identification are the same as those required by the European Commission, namely: 1) Name, First Name, Permanent Address, Identity Card/Passport Number or the number of another accepted identity document, VAT number and/or Personal number (for certain countries), NUP Number (for staff only), PerID (for staff only), Date/Place/Country of Birth, Email address, Phone number, title, function, Legal & Budgetary commitments, Payments, Bank account number (IBAN and BIC codes), Bank account name, Address declared to the bank, Copy of ID document, Signature, Payment Currency, Bank statement, EDES flag. 2) Professional information related to the execution of financial transaction workflows and including related justification documents and information based on CV.
9.	Time limit for keeping the data	Personal data included in Invoices, Business Partners Identification Forms (previously mentioned as Legal Entity and Financial Identification Forms): 10 years after the year of the last payment related to the contract. 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	<u>Internal Recipients:</u> - The mail registration service staff; - The HR service responsible for induction of incoming staff, Seconded National Expert (SNE), trainee, and interim agent. - The Operational Initiating and Verifying Agents (Project Manager or Assistant), and other support staff who initiate or review the financial transaction and ensure its validity; - Cedefop's financial actors for processing of the financial transaction; - The Authorising Officer or Authorising Officer by delegation to approve a financial transaction; - Cedefop's staff internally responsible for audit activities, as well as staff of external entities providing audit services to Cedefop may have access to the personal data collected through this processing operation, to the extent necessary for carrying out their activities. <u>External Recipients:</u> - European Commission, DG BUDG, designated persons in charge of LE/BA registration in SUMMA and maintenance and support of ABAC and SUMMA.
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. In addition, DG BUDG of the European Commission has in place a robust security policy governing the operations of the financial management system (ABAC and SUMMA); Physical access control for paper files applies, as they are stored in locked offices until they are archived or destroyed according to the retention policy of Cedefop.

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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