



Department For Resources And Support

**Privacy Statement on the protection of personal data in relation to  
Reimbursement of travel expenses - for non-staff members**

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.

**Identity of controller:**

The controller is Cedefop and the responsible service is Department of Resources and Support, Finance and Procurement Service. Enquiries on processing of personal data can be addressed to: [Cedefop-fin@Cedefop.europa.eu](mailto:Cedefop-fin@Cedefop.europa.eu)

**Processors:**

The European Commission who owns the EU Survey platform, which is used by participants to claim the reimbursement of expenses and upload their supporting documents and FIF and LEF forms.

**Purpose and description of processing:**

Process requests for reimbursement of travel expenses (according to the applicable rules and the invitation letter) for external experts who participate in Cedefop events.

Cedefop staff responsible for the organisation of an event send invitations and reimbursement request forms to participants. Participants fill out and sign the reimbursement request forms and submit supporting documents (flight ticket or boarding pass and other receipts), as specified in the rules for reimbursement of experts. The reimbursement request form is signed and approved by the relevant Cedefop staff member and, on the basis of the approved request and its supporting documents, the Finance & Procurement service staff proceed to the calculation of the amount to be reimbursed to the expert<sup>1</sup>.

The payment is executed to the bank account indicated on the reimbursement request form, following an approval process.

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<sup>1</sup> see record for Financial Transactions in Cedefop's web portal data protection page: <https://www.cedefop.europa.eu/en/content/personal-data-protection>

**Data subjects:**

External experts invited to Cedefop meetings claiming reimbursement of expenses, Cedefop staff responsible for the organisation of an event, Cedefop financial services staff.

**Data processed:**

The data undergoing processing are as follows: (bullet points)

- Participant details: surname, first name, address, postal code, city, country, signature;
- Organisation details: name, address, postal code, city, country, telephone number;
- Reimbursement details: transport used, date & place of departure, date & place of arrival, price and currency paid, number of meals offered by Cedefop, total expenses, total allowances, total to pay, signature of financial service;
- Meeting details: meeting name;
- Cedefop staff member organising the event: name, signature of staff member;
- Bank details: account holder, BIC (SWIFT Code), IBAN;
- Supporting documents (e.g. e-ticket or invoice or boarding passes)
- Data included in Legal Entity Form and Financial Identification Form, where necessary.

No sensitive personal data (e.g. revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and the processing of data concerning health or sex life) is collected.

**Legal basis / lawfulness:**

Data is processed in accordance with DIR 13/2023 - Decision on rules for reimbursement of expenses of external experts invited to Cedefop meetings.

The lawfulness of the processing is defined by Article 5(1)(a) of the Regulation (EU) 2018/1725.

**Recipients of data:**

- Finance service, Accountancy service;
- Cedefop Authorising Officers (in order to approve payments);
- Cedefop project managers and their support staff who are actors in the payment workflow (in order to confirm the reimbursement entitlements and initiate corresponding payments);
- DG-DIGIT's EUSurvey Support team has access to all system assets for providing support and troubleshooting;
- Other institutions staff (Court of Auditors - IAS - OLAF, etc) for control of the financial file.

**The retention period of the collected personal data:**

All data related to a meeting will be deleted from EU Survey platform as soon as the last payment is executed to experts attending the specific meeting.

Reimbursement forms and supporting documents shall be kept for 5 years, counting from the date of discharge granted for the financial year of the payment execution.

**Data subject's rights:**

- a) the right to **access**, as foreseen in article 17 of the Regulation
- b) the right to **rectification**, as foreseen in article 18 of the Regulation (as far as is reasonably possible)
- c) the right to **erasure**, as foreseen in article 19 of the Regulation
- d) the right to **object**, as foreseen in article 23 of the Regulation
- e) the right to **lodge a complaint with the European Data Protection Supervisor** (EDPS), as foreseen in article 63 of the Regulation.

Queries and concerns regarding the processing of your personal data may also be addressed to Cedefop's Data Protection Officer at the following email: [data-protection-officer@cedefop.europa.eu](mailto:data-protection-officer@cedefop.europa.eu)

Data subjects are also entitled to have recourse at any time to the European Data Protection Supervisor: <http://www.edps.europa.eu>

**UPDATED:** 16 January 2024