

Cedefop record of processing activity

Reimbursement of travel expenses – for non-staff members

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
1.	Last update of this record	16/01/2024
2.	Reference number	CDFNOT0022
3.	Name and contact details of controller	<p>Cedefop – European Centre for the Development of Vocational Training Postal address: Cedefop Service Post, Europe 123, 570 01 Thessaloniki, GREECE Telephone: (+30) 2310-490111 Email: info@cedefop.europa.eu</p> <p>Responsible department or role: Department of Resources and Support, Finance and Procurement Service</p> <p>Enquiries on processing of personal data can be addressed to: Cedefop-fin@Cedefop.europa.eu</p>
4.	Name and contact details of DPO	data-protection-officer@cedefop.europa.eu
5.	Name and contact details of joint controller (where applicable)	Note that Cedefop introduces information from Legal Entity and Bank Account forms in the ABAC financial and accounting system of the European Commission – DG BUDG. Such information is validated by the DG BUDG dedicated team. DG BUDG manages and is controller of ABAC and Cedefop uses it under a specific Service Level agreement (SLA). The relevant privacy statement of the European Commission is found here:

		https://ec.europa.eu/info/sites/default/files/about_the_european_commission/eu_budget/lef_baf_privacy_notice-en.pdf
6.	Name and contact details of processor (where applicable)	<ul style="list-style-type: none"> 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.
7.	Very short description and purpose of the processing	<p>Purpose of the 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.</p> <p>Cedefop staff responsible for the organisation of an event send invitations and reimbursement request forms (either a link to the EU Survey form or Annex II of the Decision DIR 13/2023) to participants. Participants either 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, or submit their request for reimbursement using the EU Survey platform. The reimbursement request form is 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 external expert.</p> <p>In order to get reimbursed, Cedefop designated staff registers either the expert information, if the expenses are paid to him/her directly, or the entity he/she represents in ABAC (the financial system developed by the European Commission and used by Cedefop). The legal entity (individual or organisational) and bank account details are introduced in ABAC, on the basis of Legal Entity (LEF) and Financial Identification (FIF) forms duly filled in and supported by relevant documents mentioned therein¹.</p> <p>The payment is executed to the bank account indicated on the reimbursement request form, following an approval process.</p> <p>Legal basis: DECISION DIR 13/2023 - Rules for reimbursement of expenses of external experts invited to Cedefop meeting</p>

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

8.	Description of categories of persons whose data Cedefop processes and list of data categories	<p>Persons: External experts invited to Cedefop meetings claiming reimbursement of expenses, Cedefop staff responsible for the organisation of an event, Cedefop financial services staff (signature).</p> <p>Data categories (collected either in EU Survey or the form in Annex 2 of the DIR decision 13/2023):</p> <ul style="list-style-type: none"> - 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) - Legal Entity Form and Financial Identification Form, where necessary.
9.	Time limit for keeping the data	<p>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.</p> <p>Reimbursement forms and supporting documents shall be kept in Cedefop's records bank for 5 years, counting from the date of discharge granted for the financial year of the payment execution.</p>
10.	Recipients of the data	<ul style="list-style-type: none"> • Finance service, Accountancy service • Cedefop Authorizing 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.
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	N/A

12.	General description of security measures where possible.	<ul style="list-style-type: none"> • Access to EU survey Admin is protected by an ECAS log-in which is required. • 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 request forms and supporting documents stored in Cedefop's records bank are labelled and treated as sensitive, non-classified (SNC) data²; • Communication of data is restricted to those persons who "need to know" for the performance of their duties; • Electronic data and documents are stored in Cedefop's records bank where "need to know" access rights are granted for the performance of data recipients' duties;
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	Data protection disclaimer on reimbursement form itself. Data protection record published in Cedefop web portal. Privacy statement available upon request.

² RB(2019)01250 DIR decision - Rules on sensitive non-classified information