



EMA/472281/2019

## Record of data processing activity relating to legal entity and bank account validation (public)

1.	Last update of this record, version number:	31 December 2019, version 1
2.	Reference number:	A10
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of Administration and Corporate Management Division datacontroller.administration@ema.europa.eu
4.	Name and contact details of DPO:	dataprotection@ema.europa.eu
5.	Name and contact details of joint controller (where applicable)	Not applicable
6.	Name and contact details of processor (where applicable)	Not applicable
7.	Purpose of the processing	EMA uses the personal data of staff members, seconded national experts, trainees, interims, persons attending selection procedures and participants in regulatory and scientific meetings to: <ul style="list-style-type: none"><li>• establish the legal entity and payment details of the payee and enter them in a file for which the accounting officer is responsible in order to ensure transparency, accountability and proper payment implementation and to process and account;</li><li>• to process and account for financial and contractual relations individuals have or will have with the Agency, for example, in the context of paying salaries, allowances to staff members and reimbursement for attending regulatory and scientific meetings to delegates.</li></ul>



8.	Description of categories of persons whose data EMA processes and list of data categories	<p>The following categories of data subjects are subject to this processing operation:</p> <ul style="list-style-type: none"> <li>• Staff members,</li> <li>• Seconded national experts,</li> <li>• Trainees,</li> <li>• Interims,</li> <li>• Persons attending selection procedures and participants to regulatory and scientific meetings</li> </ul> <p>The following categories of personal data are collected for this processing operation:</p> <ul style="list-style-type: none"> <li>• First name and surname.</li> <li>• Bank account holder name, exactly as it shows on the bank statement. If the concerned data subjects hold a joint bank account with another individual, EMA will record the full account name;</li> <li>• Bank name, IBAN, account number and sort code, SWIFT/BIC.</li> <li>• Email address for sending a remittance advice (for participants in regulatory and scientific meetings only)</li> <li>• Financial data of payment transactions made to and received from the person.</li> </ul>
9.	Time limit for keeping the data	<p>To provide an audit trail on financial transactions executed by the Agency, recorded personal data are kept for:</p> <ul style="list-style-type: none"> <li>• a maximum of 10 years after the last transaction for data related to natural persons other than Agency's staff;</li> <li>• for up to 100 years after date of birth for Agency's staff (to satisfy any request that may come in after the end of a staff member's contract or after their retirement).</li> </ul> <p>Bank statements where financial data of payment transactions made to and received from the person are kept in accordance with the retention policy in place for the keeping of financial documents.</p>
10.	Recipients of the data	<p>All authorised Agency staff dealing with financial and accounting matters have access to the personal data in question. In addition, EMA may share this personal data with European Union control authorities charged with a monitoring or inspection task in conformity with EU law, for example the Internal Audit Service of the European Commission, the Court of Auditors, the Financial Irregularities Panel, the European Anti-fraud Office (OLAF) and any other institution or entity responsible for audits or investigations.</p> <p>Financial data of payment transactions made to and received from the person are submitted and processed by the Agency's financial institution via their online banking system.</p>
11.	Are there any transfers of personal data to third countries or international organisations?	No
12.	General description of security measures, where possible.	The Agency has appropriate technical and organisational measures in place, including organisational policies, to safeguard the security of personal data and ensure the confidentiality, integrity and availability of the relevant systems,

		<p>services and the personal data processed within them. In particular,</p> <ul style="list-style-type: none"> <li>• In order to safeguard personal data against any possible misuse or unauthorised access, electronic and paper information is accessible with a restricted access only and only to people having a need to know. For example, electronic forms submitted by individuals are received in a dedicated email inbox or directly in the Agency’s central financial system, as attachment to the master record. The information and data collected in the Agency central financial system and / or in the dedicated email inbox can be accessed by designated Agency officials, using a user ID and a password.</li> <li>• The organisational entities charged with the operational execution guarantee the appropriate confidentiality and the technical and organisational security, as requested by the applicable data protection provisions.</li> </ul>
13.	<p>For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:</p>	<p>Details concerning the processing of your personal data are available on the Agency’s website at: <a href="https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement">https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement</a>, where you may find the EMA General Privacy Statement as well as the privacy statements on specific data processing operations.</p>