



22 May 2026
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Data Protection Notice for legal entity and bank account validation regarding payments

This Data Protection Notice explains the most essential details of the processing of personal data by the European Medicines Agency (hereinafter 'EMA' or 'Agency') in the context of keeping personal data records in the Agency's accounting system to fulfil obligations related to current or future, direct or indirect, financial and contractual processing activities.

It is essential to read and retain this data protection notice, together with any other notice we may provide on specific occasions when we are collecting or using personal data about you, so that you are aware of how and why we are using such data and what your rights are under 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 data¹ (hereinafter 'the EUDPR').

1. Who is responsible for processing your data?

1.1 Who is the data controller?

The European Medicines Agency ('EMA') is ultimately responsible for complying with your data protection rights and freedoms. On behalf of EMA, the Head of Administration and Corporate Management Division is appointed as 'Internal Controller' to ensure the lawful conduct of this processing operation.

You may contact the Internal Controller via the following email address:

datacontroller.administration@ema.europa.eu

1.2 Who are the data processors?

Processor	Activity	Contact Details
Microsoft Ireland Operations Limited	MS 365 services and applications to support EMA's administrative tasks and reporting processes	One Microsoft Place, South County Business Park, Carmanhall and Leopardstown, D18 P521, Dublin-Ireland

¹ 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, OJ L 295, 21.11.2018, pp. 39–98 (link available [here](#))



		https://www.microsoft.com/en-us/concern/privacyrequest-msa
SAP Belgium – Systems, Applications and Products N.V./S.A.	Operation and Maintenance of EMA’s Human Resource Information System (HRIS) and EMA budgetary and financial accounting system (SAP FIN)	Hermeslaan 9, 1831 Diegem-Belgium Privacy@sap.com
Open Text Coöperatief U.A.	Online storage of documents (Document and Record Management System)	Prof. E.M. Meijerslaan 1, 1183 AV, Amstelveen-The Netherlands DPO@opentext.com

2. Purpose of this data processing

We use the personal information of staff members (Temporary and Contract Agents), Seconded National experts, other experts, Trainees, Interims, persons attending selection procedures and participants to regulatory and scientific meetings to establish the legal entity and payment details of the payee for their services and enter them in a file. The accounting officer is responsible for creating and keeping the file up-to-date, in their duty to ensure transparency, accountability and proper payment implementation.

All financial and contractual transactions undertaken by the Agency’s departments require the identification of a unique legal entity record under the Agency’s system. Similarly, the Agency is collecting bank accounts related data to execute payments. Your personal information may also be used to collect revenues and/or recover claims to protect the financial interests of the EU.

2.1 Personal data concerned

In this processing operation we process personal data collected directly from you by filling a form and submitting it to your contact within the Agency, who will then record it in the Agency’s payees’ central financial file and send it to the accounting officer for validation.

By requesting you to fill in this form, we collect and process the information you have filled in the Financial Identification Form, as well as the supporting documents you have provided (e.g. bank statement). Such data may include the following:

- First name and surname;
- Private address (for experts only);
- Email address for sending remittance advices (for experts and participants to regulatory and scientific meetings only);
- Bank account holder name, exactly as it shows on the bank statement. If you hold a joint bank account with another individual, we will record the full account name;
- Bank name, bank account number, address declared to the bank, if shown on the bank statement;
- Signature.

2.2 Legal Basis for data processing

The processing of personal data for the purpose of bank account validation is required:

- for compliance with a legal obligation, according to Article 5(1)(b) of EUDPR and Article 51

of the Financial Regulation (FR) applicable to the budget of the European Medicines Agency;²

- for compliance with Articles 85 and 86 of Regulation (EU, Euratom) 2024/2509 (general Financial Regulation)³ on bank accounts, which apply to the Agency mutatis mutandis;
- for the compliance with Article 86 of the general Financial Regulation, laying down the powers and duties of the accounting officer with respect to the creation and management of legal entity files and for the keeping of supporting documents, which requires that *".....before entering into a commitment towards a third party, the authorising officer shall confirm the payee's identity, establish the legal entity and payment details of the payee and enter them in the common file by the Union institution for which the accounting officer is responsible. The accounting officer may only make payments if the payee's legal entity and payment details have first been entered in a common file by the Union institution for which the accounting officer is responsible..."*
- for the processing that is necessary for the performance of a task carried out in the public interest for the management and functioning of the Agency according to Article 5(1)(a) of EUDPR with reference to Recital (22) of that regulation.

In this regard, please note that you have the right to object against the processing as explained in Section 5 below.

3. How long do we keep your data?

To provide an audit trail on financial transactions executed by the Agency, recorded personal data are kept for a maximum of 10 years after the last transaction, with the exception of matters related to staff, for which the retention period is up to 120 years from date of birth of the staff member (to satisfy any request that may come in after the end of a staff member's contract or after their retirement), unless otherwise established.

4. Who has access to your information?

Dedicated EMA staff members dealing with financial and accounting matters have access to your data. The personal data obtained is accessed and processed on a need-to-know basis by dedicated EMA staff members dealing with financial and accounting matters.

The personal data for the calculation and payment of the amounts due is then processed internally by:

- dedicated members of the Staff Matters service team;
- dedicated members from other organisational entities managing financial and budgetary obligations including the financial verifying agent, the financial initiating agent, the authorising officer, the accounting officer;
- dedicated members from the Accounts Payable team of the accounting department (restricted to amount paid and name of eligible person);
- dedicated members from the Strategic Planning and Budget team (for analysis);

² Financial Regulation applicable to the budget of the European Medicines Agency from 1 July 2019, EMA/MB/911312/2019 Corrigendum of 18 December 2019 (link available [here](#)), Commission Delegated Regulation (EU) 2019/715 of 18 December 2018 on the framework financial regulation for the bodies set up under the TFEU and Euratom Treaty and referred to in Article 70 of Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council, OJ L 122, 10.5.2019, pp. 1–38 (link available [here](#))

³ Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (recast), OJ L, 2024/2509, 26.9.2024 (link available [here](#))

- the Executive Director and Assistants to Executive Director, the Deputy Executive Director, the Internal Audit Service, the Legal Department, the Data Protection Officer (DPO), in case of internal investigations, audits or other legal proceedings.

Furthermore, we may share your personal data with the following external institutions, on a need-to-know-basis or when the Agency is required to do so by law, including for monitoring, auditing or inspection purposes in accordance with European Union law:

- the European Ombudsman;
- the Court of Justice of the EU;
- the European Court of Auditors;
- the European Anti-Fraud Office (OLAF);
- the European Public Prosecutor's office (EPPO); and
- the European Data Protection Supervisor (EDPS).

5. Your data protection rights

As data subject (i.e. the individual whose personal data is processed), you have a number of rights:

- **Right to be informed** – This Data Protection Notice provides information on how EMA collects and uses your personal data. Requests for other information regarding the processing may also be directed to the Internal Controller.
- **Right to access** – You have the right to access your personal data. You have the right to request and obtain a copy of the personal data processed by EMA.
- **Right to rectification** – You have the right to obtain - without undue delay - the rectification or completion of your personal data if it is incorrect or incomplete.
- **Right to erasure** – You have the right to require EMA to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing. In certain cases your data may be kept to the extent it is necessary, for example, to comply with a legal obligation of the Agency or if it is necessary for reasons of public interest in the area of public health.
- **Right to restrict processing** – In a few, codified cases, you have the right to obtain the restriction of the processing, meaning that your data will only be stored, but not actively processed for a limited period of time. For more information about this right and its limitations, see the general EMA Data Protection and Privacy policy, hosted at [Data protection and privacy at EMA | European Medicines Agency \(EMA\)](#)
- **Right to object** – You have the right to object at any time to this processing on grounds related to your particular situation. If you do so, EMA may only continue processing your personal data if it demonstrates overriding legitimate grounds to do so or if this is necessary for the establishment, exercise or defence of legal claims.

The rights of the data subject can be exercised in accordance with the provisions of EUDPR. For anything that is not specifically provided for in this Data Protection Notice, please refer to the the general EMA Data Protection and privacy policy: [Data protection and privacy at EMA | European Medicines Agency \(EMA\)](#)

6. Recourse

In case you have any questions regarding the processing of your personal data, or you think that the processing is unlawful or it is not in compliance with this Data Protection Notice or the general EMA data protection and privacy policy, please contact

Internal Controller at datacontroller.administration@ema.europa.eu

EMA Data Protection Officer at dataprotection@ema.europa.eu

Address	Postal Address	EMA Switch Board
European Medicines Agency Domenico Scarlattilaan 6 1083 HS Amsterdam The Netherlands	European Medicines Agency PO Box 71010 1008 BA Amsterdam The Netherlands	+31 (0)88 781 6000

You also have the right to lodge a complaint with the **European Data Protection Supervisor** (EDPS) at any time at the following address:

Email: edps@edps.europa.eu

Website: www.edps.europa.eu

Further contact information: www.edps.europa.eu/about-edps/contact_en