

# Record of processing activity

## FINANCIAL TRANSACTIONS

Record of EBA activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 (EUDPR)

### Part 1 - Article 31 Record (publicly available)

1	<b>Last update of this record</b>	19/01/2026
2	<b>Date of next review</b>	19/01/2026
3	<b>Reference number</b>	EBA/DPR/2026/1
4	<b>Name and contact details of controller</b>	<p>Controller: European Banking Authority, Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France</p> <p>Represented by the Executive Director</p> <p>Responsible department: Operations</p> <p>Contact: <a href="mailto:Finance@eba.europa.eu">Finance@eba.europa.eu</a></p>
5	<b>Contact details of DPO</b>	<p><a href="mailto:dpo@eba.europa.eu">dpo@eba.europa.eu</a>, or alternatively send a letter to the postal address of the EBA (address above) marked for the attention of the DPO of the EBA.</p>
6	<b>Name and contact details of joint controller (where applicable)</b>	N/A
7	<b>Name and contact details of processor (where applicable)</b>	<p>DG BUDGET manages ABAC and SUMMA, the financial and accounting applications set up by the European Commission, to monitor the execution of its budget and to prepare its accounts.</p> <p>DG DIGIT implements and maintains the accounting systems ABAC and SUMMA.</p> <p>Rue de la Loi 200, 1040 Bruxelles, Belgique</p>

**Part 1 - Article 31 Record (publicly available)**

8	<b>Short description and purpose of the processing activity</b>	<b>Description</b>
		<p>When processing financial transactions, the EBA must record details of the third parties to whom it makes payments, and from whom we receive payments, both to enable these third parties to be identified and to enable the actual payment to their bank account to be processed in the EBA financial systems (ABAC, SUMMA, PAWS, CATS). ABAC and SUMMA are the DG BUDGET managed financial and accounting applications that have been set up by the Commission to monitor the execution of the EU budget and accounts. PAWS is an internal workflow of the EBA to manage the internal process of payments. CATS is an internal workflow of the EBA to manage the internal process of budgetary commitment transactions.</p> <p>As part of the processes, EBA uses Adobe Sign for electronic signature of: budget transfers; legal commitments (contracts and purchase orders); non-compliance and exception notes; and delegations of budgetary powers.</p> <p>All IT tools are developed according to a standard set of security and are thoroughly tested accordingly, to ensure robustness and reliability. The financial and business travel and mission's expenses tool are in secured network. Paper files are stored in secured lockers and are destroyed in compliance with the EBA retention policy.</p>
<b>Purpose</b>		
		<p>The purpose of this process is to implement the budget of the EBA by executing payments to staff, experts, contractors and beneficiaries and receiving payments from third parties. The financial transactions are made of:</p> <ul style="list-style-type: none"> <li>• Budgetary commitments</li> <li>• Legal commitments, including contracts and purchase orders</li> <li>• Payments</li> <li>• Recovery orders</li> <li>• Transfers between budget lines</li> </ul>
<b>Categories of persons</b>		
9	<b>Description of categories of persons whose data the EBA processes and list of data categories</b>	<p>EBA Temporary Agents and Contract Agents</p> <p>Seconded National Experts (SNE), Trainees, Staff on exchange</p> <p>Visitors to the EBA</p> <p>Candidates to EBA's selection procedures</p> <p>Members of recruitment panels</p> <p>Members of the Banking Stakeholders Group and Board of Appeal,</p> <p>Attendees and speakers at seminars and events</p> <p>Staff of providers of good or services: external suppliers</p> <p>Relatives and associates of data subjects</p>
<b>Categories of personal data</b>		
		<ul style="list-style-type: none"> <li>• Personal details (name, address, country of residence and other personal data contained in the documents supporting reimbursable costs)</li> </ul>

**Part 1 - Article 31 Record (publicly available)**

- Education & Training details (if relevant to the nature of the request, such as CV or additional trainings and certificates)
- Employment details (title, company, department, e-mail address, business telephone number, mobile telephone number, fax number, postal address)
- Financial details (bank account number and beneficiary)
- Family, lifestyle and social circumstances, (if relevant to the nature of the request, such as children school and tuitions)

10	<b>Special categories of personal data processed (as defined in Article 10 EUDPR)</b>	No special categories of personal data are specifically required for this processing activity.
11	<b>Time limit for keeping the data</b>	Files relating to financial transactions are to be retained in the archives for a period of 5 years following the discharge of the financial exercise. The discharge of the financial exercise generally takes place 2 years after the financial year, meaning a total of 7 years for holding the personal data or until the end of a possible audit if it started before the end of the above period.
12	<b>Recipients of the data</b>	<p>The personal data is accessible within the EBA by designated EBA staff in Finance and Procurement Unit. In certain situations, the data can be made available to:</p> <ul style="list-style-type: none"> <li>• Healthcare practitioners;</li> <li>• Education/training establishments;</li> <li>• External contractors;</li> <li>• Other EU Institutions/Agencies/Bodies.</li> </ul>
13	<b>Are there any transfers of personal data to third countries or international organisations?</b>	<p>The data is processed by the EBA within the EU/EEA. The data is shared with other EU Institutions such as the European commission based on corresponding agreements.</p> <p>Possible transfers outside the EU/EEA are based on adequacy decisions or Standard Contractual Clauses.</p>
14	<b>General description of security</b>	<p>Processing of personal data in the context of this processing activity is performed under the EBA Information Security Framework, published on the EBA intranet. The security controls includes:</p> <ul style="list-style-type: none"> <li>• Controlled access to ICT-system/controlled access codes;</li> </ul>

**Part 1 - Article 31 Record (publicly available)**

<b>measures, where possible</b>	<ul style="list-style-type: none"><li>• Restricted access to physical location where data is stored;</li><li>• Back-up;</li><li>• Audit trails;</li><li>• Confidentiality agreement/clause;</li><li>• Test the effectiveness of security measures adopted;</li><li>• Training of staff.</li></ul>
<b>15 For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:</b>	<p>The Data Protection Notice is available on the EBA website.</p> <p>In certain situations, the data subjects may be provided with a specific data protection notice.</p>