

RECORD NO: 17

FINANCIAL TRANSACTIONS

Record 17 of processing operation “Financial transactions”

Date of last update	29/8/2024
Name and contact details of controller	ENISA, Corporate Support Services Unit (FIN), finance [at] enisa.europa.eu
Name and contact details of DPO	dataprotection [at] enisa.europa.eu
Name and contact details of Joint Controller	European Commission - DG BUDGET manages ABAC, the financial and accounting application set up by the Commission, to monitor the execution of its budget and to prepare its financial accounts. ENISA has a specific SLA with DG Budget for the provision of this service. Contact: DIGIT-SYSPEP2 [at] ec.europa.eu
Name and contact details of processor	GRANT THORNTON SA CHARTERED ACCOUNTANTS & MANAGEMENT CONSULTANTS that offers external accounting and tax services
Purpose of the processing	<p>The purpose of this processing operation is to implement ENISA's budget, as well as to manage and monitor relevant financial transactions, in line with ENISA's financial rules, as these are adopted in conformity with the Commission Delegated Regulation (EU) No 2019/715.</p> <p>The main processes and systems concerned include:</p> <ol style="list-style-type: none"> 1. ABAC, which is a Commission system used for financial execution (income and expenditure). ENISA employs trained staff to operate ABAC. ABAC contains a SAP module in relation to accounting operations. In ABAC, eligible beneficiaries (third parties) are identified on the basis of structured data as Legal Entities and in relation to their Banking details. The third party process is managed centrally by the Commission. 2. ARES, which is an European Commission 's document management application to among other facilitate authorisation workflows; it is used concurrently and complementary with ABAC to inter alia store support documentation. 3. In addition ENISA keeps internal financial and project files that contain data, including personal data, to support financial planning. This processing includes the public procurement cycle. Data in this case is stored on the ENISA intranet that uses Sharepoint that it maintains under its direct control. 4. Communications concerning financial transactions may also be held as need be in the electronic mail system of the Agency as Financial Actors communicate among themselves, as well as with beneficiaries in relation to given financial transactions. ENISA uses an Exchange server for electronic mail services that it maintains under its direct control. 5. In terms of processing, ENISA relies on an external supplier to procure external accounting and tax services notably in relation to VAT exemptions (data processor). There is no dedicated system for this process; communication is carried out via email and data is stored on local systems of said supplier. 6. In relation to audit and control, ENISA carries out ex-post controls and is subjected to internal audits carried out by the Commission Internal Audit Service and external audits carried out by the European Court



	<p>of Auditors. Also ENISA cooperates with OLAF in relation to investigations. Clearly, personal data is processed by the mentioned Institutions.</p> <p>The financial transactions concerned, consist of:</p> <ul style="list-style-type: none"> - Budgetary commitments: the transaction by which ENISA earmarks appropriations available to cover one or more future legal commitments. Budgetary commitments are processed and authorised in ABAC system. - Payments: the operation that releases ENISA from an obligation towards a creditor on the basis of a legal commitment. A payment consists of transferring appropriations committed to an eligible and designated beneficiary e.g. a third party provider, a staff member etc. <p>Data processed includes data related to natural and legal persons and it includes banking details.</p> <p>Personal data processed, are required to allow financial identification, in order to process the payment (ingoing or outgoing) and to record it as such in the Agency's financial management systems.</p> <p>The data may also be processed in the context of relevant assessments of financial transactions in line with the ENISA's financial rules. While such assessments do not typically target natural persons as such, they may involve the processing of personal data included in the relevant financial management systems, such as ABAC and ARES.</p>
<p>Description of data subjects</p>	<p>Every third party that has entered into a financial transaction with ENISA. By way of example, this may include, but is not limited to, ENISA staff Members, financial contributors (EC) and external suppliers and individuals having a legal commitment with ENISA.</p>
<p>Description of data categories</p>	<p>1) Personal data related to financial identification are the same as those required by the Commission and it is used to populate the third part data fields in ABAC, namely:</p> <ul style="list-style-type: none"> - Name (first name, family name, previous family name); - Gender, nationality, title, function; - Contact information (e-mail address, business telephone number, mobile telephone number, fax number, postal address, company and department, country of residence, internet address); - Bank account reference (IBAN and BIC codes); - VAT number, national insurance number; - ID card/Passport number and personal number; - Place and date of birth. <p>All data are kept centrally (European Commission ABAC system). They may also be processed in an internal workflow.</p> <p>2) Professional information related to the execution of relevant financial transaction workflows and including related justification documents and information. The data are processed in the ENISA's internal paperless system, as well as in paper-based form (e.g. invoices).</p> <p>3) Financial assessment or audit reports, provided in accordance with ENISA's financial rules, shall in principle not include personal data. In the rare case that such reports include personal data, any further processing of this data will be handled under the relevant applicable legal basis, such as the one on administrative inquiries and disciplinary proceedings.</p>
<p>Time limits (for the erasure of data)</p>	<p>As per ENISA's applicable financial rules (Article 47) and for audit purposes, 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 is generally authorised 2 years after the financial year, for a total of minimum 7 years for retaining personal data.</p>



Data recipients	<ul style="list-style-type: none"> - The Operational Initiating Agent (aka Project Manager) and other support staff to manage the financial transaction and to ensure its validity; - ENISA's financial actors for processing of the financial file; - the Authorising Officer or Authorising Officers by delegation to approve a financial transaction; - ENISA assessment or audit panels as appointed by the Executive Director for internal control of the financial transactions, in line with the ENISA's financial rules. - The European Commission ABAC agents; - Other institutions delegates (Court of Auditors - IAS - OLAF) for control of the financial file.
Transfers to third countries	No transfers outside EU/EEA are foreseen.
Security measures - General description	<ul style="list-style-type: none"> - Security policy of financial management system (ABAC); -General security policy and technical/organisational measures for ENISA's internal IT systems; - Physical access control for paper files.
Privacy statement	Available on ENISA's intranet for all ENISA staff.

