

**PRIVACY STATEMENT FOR EXTERNAL AUDITS AND CONTROLS CARRIED OUT  
BY THE EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR EUROPEAN CIVIL PROTECTION AND HUMANITARIAN AID OPERATIONS (DG ECHO)**

**PROTECTION OF YOUR PERSONAL DATA**

**Processing operation:** External audits and controls carried out by the European Commission

**Data Controller:** European Commission, Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO), Unit E.2 – Programming, Control and Reporting

**Processor:** DELOITTE AUDITORES SL

**Record reference:** DPR-EC-04466

**Table of contents:**

1. Introduction
2. Why and how do we process your personal data?
3. On what legal ground(s) do we process your personal data?
4. Which personal data do we collect and further process?
5. How long do we keep your personal data?
6. How do we protect and safeguard your personal data?
7. Who has access to your personal data and to whom is it disclosed?
8. What are your rights and how can you exercise them?
9. Contact information
10. Where to find more detailed information?

**1. Introduction**

The European Commission (hereafter ‘the Commission’) is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to 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, is applicable (repealing Regulation (EC) 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

This privacy statement concerns the processing operation ‘External audits and controls’, undertaken by the Commission, Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO), Unit E.2 – Programming, Control and Reporting (hereafter ‘ECHO.E.2’) as presented below.

The data controller may decide to involve an external company for conducting the external audit or control. In case an external company conducts any processing of personal data for the purpose of the processing operation described in the present privacy statement, the external company is a processor pursuant to Article 3(12) of Regulation 2018/1725.

Processor: DELOITTE AUDITORES SL

PLAZA PABLO RUIZ PICASSO 1

TORRE PICASSO

28020 MADRID

SPAIN

Contact: [auditdgecho@deloitte.es](mailto:auditdgecho@deloitte.es)

## **2. Why and how do we collect your personal data?**

Purpose of the processing operation: ECHO.E.2 collects and uses your personal data to do any kind of the following financial control including: (1) ex-ante controls, (2) desk checks, (3) financial verifications, and (4) audits of grant agreements or contracts to verify beneficiaries' or contractors', subcontractors' or third parties' compliance with all contractual provisions (including financial provisions), in view of checking that the provisions of the grant agreements or the contracts are being properly implemented and in view of assessing the legality and regularity of the transaction underlying the implementation of the general budget of the Union.

Your personal data will not be used for an automated decision-making including profiling.

## **3. On what legal ground(s) do we process your personal data**

The possibility for the Commission to carry out checks and financial controls is foreseen in the model grant agreement and contract signed between the Commission and the beneficiary/contractor, as required by the Regulation (EU, Euratom) 2024/2509 (Financial Regulation (hereafter 'FR')) applicable to the General Budget of the European Communities<sup>1</sup>.

We process your personal data because:

The processing operations on personal data carried out in the context of audit and control activities<sup>2</sup> are necessary and lawful under the following articles of the Regulation (EU) 1725/2018:

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<sup>1</sup> Articles 117-123 FR on internal audits, article 127 FR on cross-reliance audits, articles 186 and 206 FR on audits covering grant agreements and articles 260 – 265 FR on external audits by the Court of Auditors.

<sup>2</sup> The audit and control activities are varied across the Commission departments as they can be conducted at any time during the performance of the programme or project and can concern beneficiaries, projects, system, transactions, etc. depending on the needs of the contracting authority. The audit and control activities may be carried out on documents and/or on the spot, and may be carried out either before or after the final payment to the beneficiary. Audits and controls of documents may be carried out in any place where the funds in question are managed or used; the geographical scope is therefore worldwide. The specific contract should specify what the audit and control is to cover (subject and location).

(a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body<sup>3</sup>;

(b) processing is necessary for compliance with a legal obligation to which the controller is subject<sup>4</sup>.

#### **4. Which personal data do we collect and further process?**

In order to carry out any kind of financial controls, ex-ante and ex-post, the Data Controller could collect the following categories of personal data:

Mandatory:

- Mandatory contact data: name, company, e-mail address, telephone number;
- Mandatory data for access to finance and contractual obligations. Such data can be: bank account reference (IBAN and BIC codes), VAT number, passport or ID number; timesheets, salary slips, accounts, details of the costs, missions, reports, information coming from local IT system used to declare costs as eligible, supporting documents linked to travel costs, minutes from mission and other similar data depending of the nature of the grant/contract, etc.;
- Mandatory information for the evaluation of selection criteria or eligibility criteria: expertise, technical skills and languages, educational background, professional experience, including details on current and past employment.

Voluntary:

- Voluntary data: other contact details (mobile telephone number, fax number, professional postal address, function and department, country of residence);
- Voluntary data that may be collected by the website if there is consent to its cookies: IP address, language preference, etc.

#### **5. How long do we keep your data?**

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for 10 years after the audit is closed on condition that no contentious issues occurred; in this case, data will be kept until the end of the last possible legal procedure.

#### **6. How do we protect and safeguard your personal data?**

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the European Commission or of its contractors (processors), if contractors are engaged to assist the controller. All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

In order to protect your personal data, the European Commission has put in place a number of technical and organisational measures in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being

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<sup>3</sup> Article 5 (1) (a) of Regulation (EU) 2018/1725 and, in particular, articles 317, 319 TFEU and article 106 (a) of the Euratom Treaty.

<sup>4</sup> In particular articles 117, 186, 206 (4) and 206 (5), and 268 of the FR.

processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' [Regulation \(EU\) 2016/679](#)).

## **7. Who has access to your data and to whom is it disclosed?**

Access to your personal data may be provided on a "need to know" basis to Commission services and staff dealing with the external audit or control (including those supervising/approving), inclusive of OLAF.

In addition, staff from the Council, European Parliament, European Court of Auditors may have access to your personal data.

Your data may be shared with national managing, certifying and audit authorities in shared management, beneficiaries/final recipients and external contractors acting on behalf of the Commission.

Transfers of personal data outside of the EU or the EEA are likely to occur in the context of any kind of financial control including ex-ante controls, desk checks, financial verifications and audits of grant agreements or contracts.

Processing of personal data by the processor may qualify as international transfer when the contractor is a non-EU/EEA entity or makes recourse to a local office located in the country where the project/programme is implemented or to a non-EU/EEA subcontractor.

The Commission has adopted contractual provisions in line with the applicable regulations also to include (sub) contractors in third countries.

The Commission has not adopted adequacy decisions for all these partner/beneficiary countries<sup>5</sup>. Potential transfers take place on the basis of derogations set out in Regulation (EU) 2018/1725, namely for important reason of public interest (Article 50(1)(d)).

Access to your personal data is provided to the Commission's contractor responsible for carrying out any kind of financial control including ex-ante controls, desk checks, financial verifications and audits of grant agreements or contracts and to authorised staff according to the "need to know" principle. The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law, including the possible transmission of personal data to EU bodies or institutions in charge of audit or inspection in accordance with the EU Treaties.

## **8. What are your rights and how can you exercise them?**

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

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<sup>5</sup> See a list of countries recognised as providing an adequate protection: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en).

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

## **9. Contact information**

### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller: European Commission, DG ECHO, Unit E2 – Programming, Control and Reporting ([ECHO-AUDIT@ec.europa.eu](mailto:ECHO-AUDIT@ec.europa.eu))

### **- The Data Protection Officer of the European Commission**

You may contact the Data Protection Officer ([data-protection-officer@ec.europa.eu](mailto:data-protection-officer@ec.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

### **- The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor at [https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en](https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en) or at [edps@edps.europa.eu](mailto:edps@edps.europa.eu), if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

## **10. Where to find more detailed information?**

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: **DPR-EC-04466**.

**PRIVACY STATEMENT FOR EXTERNAL AUDITS AND CONTROLS CARRIED OUT  
BY THE EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR EUROPEAN CIVIL PROTECTION AND HUMANITARIAN AID OPERATIONS (DG ECHO)**

**PROTECTION OF YOUR PERSONAL DATA**

**Processing operation:** External audits and controls carried out by the European Commission

**Data Controller:** European Commission, Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO), Unit E.2 – Programming, Control and Reporting

**Processor:** EY BEDRIJFREVISOREN/ REVISEURS D'ENTREPRISES

**Record reference:** DPR-EC-04466

**Table of contents:**

1. Introduction
2. Why and how do we process your personal data?
3. On what legal ground(s) do we process your personal data?
4. Which personal data do we collect and further process?
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7. Who has access to your personal data and to whom is it disclosed?
8. What are your rights and how can you exercise them?
9. Contact information
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**11. Introduction**

The European Commission (hereafter 'the Commission') is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to 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, is applicable (repealing Regulation (EC) 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

This privacy statement concerns the processing operation 'External audits and controls', undertaken by the Commission, Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO), Unit E.2 – Programming, Control and Reporting (hereafter 'ECHO.E.2') as presented below.

The data controller may decide to involve an external company for conducting the external audit or control. In case an external company conducts any processing of personal data for the purpose of the processing operation described in the present privacy statement, the external company is a processor pursuant to Article 3(12) of Regulation 2018/1725.

Processor: EY BEDRIJFREVISOREN/ REVISEURS D'ENTREPRISES

KOUTERVELDSTRAAT 7B/1

1831 MACHELEN,

BELGIUM

Contact: [ey.echo2025@be.ey.com](mailto:ey.echo2025@be.ey.com)

## **12. Why and how do we collect your personal data?**

Purpose of the processing operation: ECHO.E.2 collects and uses your personal data to do any kind of the following financial control including: (1) ex-ante controls, (2) desk checks, (3) financial verifications, and (4) audits of grant agreements or contracts to verify beneficiaries' or contractors', subcontractors' or third parties' compliance with all contractual provisions (including financial provisions), in view of checking that the provisions of the grant agreements or the contracts are being properly implemented and in view of assessing the legality and regularity of the transaction underlying the implementation of the general budget of the Union.

Your personal data will not be used for an automated decision-making including profiling.

## **13. On what legal ground(s) do we process your personal data**

The possibility for the Commission to carry out checks and financial controls is foreseen in the model grant agreement and contract signed between the Commission and the beneficiary/contractor, as required by the Regulation (EU, Euratom) 2024/2509 (Financial Regulation (hereafter 'FR')) applicable to the General Budget of the European Communities<sup>6</sup>.

We process your personal data because:

The processing operations on personal data carried out in the context of audit and control activities<sup>7</sup> are necessary and lawful under the following articles of the Regulation (EU) 1725/2018:

(a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body<sup>8</sup>;

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<sup>6</sup> Articles 117-123 FR on internal audits, article 127 FR on cross-reliance audits, articles 186 and 206 FR on audits covering grant agreements and articles 260 – 265 FR on external audits by the Court of Auditors.

<sup>7</sup> The audit and control activities are varied across the Commission departments as they can be conducted at any time during the performance of the programme or project and can concern beneficiaries, projects, system, transactions, etc. depending on the needs of the contracting authority. The audit and control activities may be carried out on documents and/or on the spot, and may be carried out either before or after the final payment to the beneficiary. Audits and controls of documents may be carried out in any place where the funds in question are managed or used; the geographical scope is therefore worldwide. The specific contract should specify what the audit and control is to cover (subject and location).

(b) processing is necessary for compliance with a legal obligation to which the controller is subject<sup>9</sup>.

#### **14. Which personal data do we collect and further process?**

In order to carry out any kind of financial controls, ex-ante and ex-post, the Data Controller could collect the following categories of personal data:

Mandatory:

- Mandatory contact data: name, company, e-mail address, telephone number;
- Mandatory data for access to finance and contractual obligations. Such data can be: bank account reference (IBAN and BIC codes), VAT number, passport or ID number; timesheets, salary slips, accounts, details of the costs, missions, reports, information coming from local IT system used to declare costs as eligible, supporting documents linked to travel costs, minutes from mission and other similar data depending of the nature of the grant/contract, etc.;
- Mandatory information for the evaluation of selection criteria or eligibility criteria: expertise, technical skills and languages, educational background, professional experience, including details on current and past employment.

Voluntary:

- Voluntary data: other contact details (mobile telephone number, fax number, professional postal address, function and department, country of residence);
- Voluntary data that may be collected by the website if there is consent to its cookies: IP address, language preference, etc.

#### **15. How long do we keep your data?**

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for 10 years after the audit is closed on condition that no contentious issues occurred; in this case, data will be kept until the end of the last possible legal procedure.

#### **16. How do we protect and safeguard your personal data?**

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the European Commission or of its contractors (processors), if contractors are engaged to assist the controller. All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

In order to protect your personal data, the European Commission has put in place a number of technical and organisational measures in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

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<sup>8</sup> Article 5 (1) (a) of Regulation (EU) 2018/1725 and, in particular, articles 317, 319 TFEU and article 106 (a) of the Euratom Treaty.

<sup>9</sup> In particular articles 117, 186, 206 (4) and 206 (5), and 268 of the FR.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' [Regulation \(EU\) 2016/679](#)).

### **17. Who has access to your data and to whom is it disclosed?**

Access to your personal data may be provided on a "need to know" basis to Commission services and staff dealing with the external audit or control (including those supervising/approving), inclusive of OLAF.

In addition, staff from the Council, European Parliament, European Court of Auditors may have access to your personal data.

Your data may be shared with national managing, certifying and audit authorities in shared management, beneficiaries/final recipients and external contractors acting on behalf of the Commission.

Transfers of personal data outside of the EU or the EEA are likely to occur in the context of any kind of financial control including ex-ante controls, desk checks, financial verifications and audits of grant agreements or contracts.

Processing of personal data by the processor may qualify as international transfer when the contractor is a non-EU/EEA entity or makes recourse to a local office located in the country where the project/programme is implemented or to a non-EU/EEA subcontractor.

The Commission has adopted contractual provisions in line with the applicable regulations also to include (sub) contractors in third countries.

The Commission has not adopted adequacy decisions for all these partner/beneficiary countries<sup>10</sup>. Potential transfers take place on the basis of derogations set out in Regulation (EU) 2018/1725, namely for important reason of public interest (Article 50(1)(d)).

Access to your personal data is provided to the Commission's contractor responsible for carrying out any kind of financial control including ex-ante controls, desk checks, financial verifications and audits of grant agreements or contracts and to authorised staff according to the "need to know" principle. The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law, including the possible transmission of personal data to EU bodies or institutions in charge of audit or inspection in accordance with the EU Treaties.

### **18. What are your rights and how can you exercise them?**

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

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<sup>10</sup> See a list of countries recognised as providing an adequate protection: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en).

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

## **19. Contact information**

### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller: European Commission, DG ECHO, Unit E2 – Programming, Control and Reporting ([ECHO-AUDIT@ec.europa.eu](mailto:ECHO-AUDIT@ec.europa.eu))

### **- The Data Protection Officer of the European Commission**

You may contact the Data Protection Officer ([data-protection-officer@ec.europa.eu](mailto:data-protection-officer@ec.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

### **- The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor at [https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en](https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en) or at [edps@edps.europa.eu](mailto:edps@edps.europa.eu), if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

## **20. Where to find more detailed information?**

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

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**PROTECTION OF YOUR PERSONAL DATA**

**Processing operation:** External audits and controls carried out by the European Commission

**Data Controller:** European Commission, Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO), Unit E.2 – Programming, Control and Reporting

**Processor:** PKF LITTLEJOHN LLP

**Record reference:** DPR-EC-04466

**Table of contents:**

1. Introduction
2. Why and how do we process your personal data?
3. On what legal ground(s) do we process your personal data?
4. Which personal data do we collect and further process?
5. How long do we keep your personal data?
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**21. Introduction**

The European Commission (hereafter ‘the Commission’) is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to 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, is applicable (repealing Regulation (EC) 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

This privacy statement concerns the processing operation ‘External audits and controls’, undertaken by the Commission, Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO), Unit E.2 – Programming, Control and Reporting (hereafter ‘ECHO.E.2’) as presented below.

The data controller may decide to involve an external company for conducting the external audit or control. In case an external company conducts any processing of personal data for the purpose of the processing operation described in the present privacy statement, the external company is a processor pursuant to Article 3(12) of Regulation 2018/1725.

Processor: PKF LITTLEJOHN LLP

15 Westferry Circus,

Canary Wharf,

London E14 4HD,

UK

Contact: [echo@eu-audits.eu](mailto:echo@eu-audits.eu)

## **22. Why and how do we collect your personal data?**

Purpose of the processing operation: ECHO.E.2 collects and uses your personal data to do any kind of the following financial control including: (1) ex-ante controls, (2) desk checks, (3) financial verifications, and (4) audits of grant agreements or contracts to verify beneficiaries' or contractors', subcontractors' or third parties' compliance with all contractual provisions (including financial provisions), in view of checking that the provisions of the grant agreements or the contracts are being properly implemented and in view of assessing the legality and regularity of the transaction underlying the implementation of the general budget of the Union.

Your personal data will not be used for an automated decision-making including profiling.

## **23. On what legal ground(s) do we process your personal data**

The possibility for the Commission to carry out checks and financial controls is foreseen in the model grant agreement and contract signed between the Commission and the beneficiary/contractor, as required by the Regulation (EU, Euratom) 2024/2509 (Financial Regulation (hereafter 'FR')) applicable to the General Budget of the European Communities<sup>11</sup>.

We process your personal data because:

The processing operations on personal data carried out in the context of audit and control activities<sup>12</sup> are necessary and lawful under the following articles of the Regulation (EU) 1725/2018:

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<sup>11</sup> Articles 117-123 FR on internal audits, article 127 FR on cross-reliance audits, articles 186 and 206 FR on audits covering grant agreements and articles 260 – 265 FR on external audits by the Court of Auditors.

<sup>12</sup> The audit and control activities are varied across the Commission departments as they can be conducted at any time during the performance of the programme or project and can concern beneficiaries, projects, system, transactions, etc. depending on the needs of the contracting authority. The audit and control activities may be carried out on documents and/or on the spot, and may be carried out either before or after the final payment to the beneficiary. Audits and controls of documents may be carried out in any place where the funds in question are managed or used; the geographical scope is therefore worldwide. The specific contract should specify what the audit and control is to cover (subject and location).

(a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body<sup>13</sup>;

(b) processing is necessary for compliance with a legal obligation to which the controller is subject<sup>14</sup>.

#### **24. Which personal data do we collect and further process?**

In order to carry out any kind of financial controls, ex-ante and ex-post, the Data Controller could collect the following categories of personal data:

Mandatory:

- Mandatory contact data: name, company, e-mail address, telephone number;
- Mandatory data for access to finance and contractual obligations. Such data can be: bank account reference (IBAN and BIC codes), VAT number, passport or ID number; timesheets, salary slips, accounts, details of the costs, missions, reports, information coming from local IT system used to declare costs as eligible, supporting documents linked to travel costs, minutes from mission and other similar data depending of the nature of the grant/contract, etc.;
- Mandatory information for the evaluation of selection criteria or eligibility criteria: expertise, technical skills and languages, educational background, professional experience, including details on current and past employment.

Voluntary:

- Voluntary data: other contact details (mobile telephone number, fax number, professional postal address, function and department, country of residence);
- Voluntary data that may be collected by the website if there is consent to its cookies: IP address, language preference, etc.

#### **25. How long do we keep your data?**

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for 10 years after the audit is closed on condition that no contentious issues occurred; in this case, data will be kept until the end of the last possible legal procedure.

#### **26. How do we protect and safeguard your personal data?**

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the European Commission or of its contractors (processors), if contractors are engaged to assist the controller. All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

In order to protect your personal data, the European Commission has put in place a number of technical and organisational measures in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being

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<sup>13</sup> Article 5 (1) (a) of Regulation (EU) 2018/1725 and, in particular, articles 317, 319 TFEU and article 106 (a) of the Euratom Treaty.

<sup>14</sup> In particular articles 117, 186, 206 (4) and 206 (5), and 268 of the FR.

processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' [Regulation \(EU\) 2016/679](#)).

## **27. Who has access to your data and to whom is it disclosed?**

Access to your personal data may be provided on a "need to know" basis to Commission services and staff dealing with the external audit or control (including those supervising/approving), inclusive of OLAF.

In addition, staff from the Council, European Parliament, European Court of Auditors may have access to your personal data.

Your data may be shared with national managing, certifying and audit authorities in shared management, beneficiaries/final recipients and external contractors acting on behalf of the Commission.

Transfers of personal data outside of the EU or the EEA are likely to occur in the context of any kind of financial control including ex-ante controls, desk checks, financial verifications and audits of grant agreements or contracts.

Processing of personal data by the processor may qualify as international transfer when the contractor is a non-EU/EEA entity or makes recourse to a local office located in the country where the project/programme is implemented or to a non-EU/EEA subcontractor.

The Commission has adopted contractual provisions in line with the applicable regulations also to include (sub) contractors in third countries.

The Commission has not adopted adequacy decisions for all these partner/beneficiary countries<sup>15</sup>. Potential transfers take place on the basis of derogations set out in Regulation (EU) 2018/1725, namely for important reason of public interest (Article 50(1)(d)).

Access to your personal data is provided to the Commission's contractor responsible for carrying out any kind of financial control including ex-ante controls, desk checks, financial verifications and audits of grant agreements or contracts and to authorised staff according to the "need to know" principle. The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law, including the possible transmission of personal data to EU bodies or institutions in charge of audit or inspection in accordance with the EU Treaties.

## **28. What are your rights and how can you exercise them?**

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

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<sup>15</sup> See a list of countries recognised as providing an adequate protection: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en).

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

## **29. Contact information**

### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller: European Commission, DG ECHO, Unit E2 – Programming, Control and Reporting ([ECHO-AUDIT@ec.europa.eu](mailto:ECHO-AUDIT@ec.europa.eu))

### **- The Data Protection Officer of the European Commission**

You may contact the Data Protection Officer ([data-protection-officer@ec.europa.eu](mailto:data-protection-officer@ec.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

### **- The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor at [https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en](https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en) or at [edps@edps.europa.eu](mailto:edps@edps.europa.eu), if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

## **30. Where to find more detailed information?**

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: **DPR-EC-04466**.