



PRIVACY STATEMENT REGARDING MANAGEMENT AND IMPLEMENTATION OF THE EIT BUDGET (ABAC, SPEEDWELL AND BLUEBELL)

This privacy statement provides information on the processing of personal data of EIT staff carried out by the European Institute of Innovation and Technology while utilising ABAC, Speedwell and Bluebell tools for the purposes of management of the EIT budget.

The processing of personal data follows the provisions of Regulation (EU) 2018/1725¹ 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 (hereinafter “Regulation”).

What is personal data and what is a personal data processing operation?

Personal data shall mean any information relating to an identified or identifiable natural person (‘data subject’). An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Who are the data subjects?

The data subjects are individuals who currently have (or at one time had) contractual and/or financial transactions with the EIT.

Internal to the EIT: This includes temporary agents, contract agents, seconded national experts, trainees, members of the EIT Governing Board.

External to the EIT: all natural persons that currently have (or at one time had) contractual and/or financial transactions with the EIT (individual external providers, interims, experts, contract or temporary agents from other EU institutions/Agencies).

Who is the Data controller?

The data controller is the Head of Administration Unit at the EIT.

¹ OJ L 295, 21.11.2018, p. 39–98



EIT and European Commission (EC)-DG BUDG are joint controllers for the following processing activity: registration of Legal Entities and Bank Account Files of EIT in the Commission Financial System ABAC (Accrual Based Accounting)².

What is the purpose of personal data processing?

EIT uses IT software tools for financial management developed by ERCEA: Speedwell and Bluebell. The Speedwell IT tool is an application providing paperless workflow for the invoices, payments and commitments on the administrative and operational budget (except for grant payments).

The Bluebell IT tool is an application helping with budget planning and aiming at forecasting and monitoring the administrative budget. It also helps the accountant office in the process of cash requests preparation.

EIT uses ABAC, a transversal, transactional information system allowing for the execution and monitoring of all budgetary and accounting operations by the Commission, an Agency or Institution. The system has been developed by the Commission and includes a comprehensive set of features to ensure compliance with the Financial Regulation and the Rules of Application.

The purpose of this process is to implement the administrative and operational budget of the EIT:

- **Budgetary commitments:** the transaction by which the EIT earmarks funds to cover one or more future expense. Speedwell, Bluebell, ABAC.
- **Payments:** the operation that releases the EIT from an obligation to a creditor. A payment consists in transferring a financial amount to an external provider or a staff member's bank account. ABAC, Speedwell, Bluebell.
- **Recovery Orders:** when the Agency has made a payment in excess, it must recover the amount due. Recovery orders are processed through ARES (link to ARES privacy statement). +ABAC.
- **Payment Regularisation:** is used to regularise a temporary posting or correct a budgetary posting. Speedwell, ABAC.

The data processing operations include the collection, recording, organisation, storage, consultation, use, disclosure by transmission, erasure and destruction of personal data.

What types of personal data are processed?

Categories of personal data:

- First Name, Last Name.
- Contact information: Permanent Address, e-mail.
- Personal identification numbers: Identity Card/Passport Number or the number of an accepted identity document, Personal number (for certain countries), Personnel number, NUP Number (for staff only), PerID (for staff only).
- Financial information: Bank account number, Bank account name, Address declared with the bank, Bank Statement, salary amount.

² SLA Appendix 5b – Ares(2020)1332073- 03/03/2020



- Information concerning the data subject's contract: Unit, grade, function, salary.
- Information concerning the data subject's family: The name of the child (for schooling) (school year, which year the child attends).
- Other: Copy of ID Card/Passport, Signature, Date and Place of Birth.

*For Interims (name, function, grade, duration, contract number, order form number).

Who has access to the personal data of data subjects and to whom can they be disclosed?

Within the EIT:

The personal data of the data subjects are processed by the authorised EIT Finance and Budget Section staff and the Head of Administration Unit as well as by the authorised financial agents (FIA, FVA); by OIA, OVA, by the EIT's Internal Control Coordinator (ICC) or an EIT staff member to whom the EIT's authorising officer delegates the powers of ex-ante control and by RAO using the tools. Further details are laid down in the decision on the delegation³. For example, the EIT Director if acting as RAO. The Head of Unit/Department acting as OVA.

Within the Commission and other EU institutions/bodies/agencies:

The authorized staff that may have access to relevant personal data for audit control or investigation purposes: Accounting officer from EU Agency for Fundamental Rights (FRA), Court of Auditors, Internal Audit Service of the European Commission, European Anti-Fraud Office (OLAF).

Access to the personal data may be granted also to the European Ombudsman and the European Data Protection Supervisor upon request, the General Court and the European Court of Justice to the extent necessary for handling the review procedure and litigation.

Data recipients, Third parties subject to the GDPR⁴ and third parties not subject to the GDPR:

Exceptionally and if necessary, personal data may be disclosed to third parties, e.g. external lawyers, external auditors subject to the GDPR, for specific and limited purposes only.

Data processors who process your data on behalf of the EIT:

- EC-DG BUDG for ABAC: DG BUDGET manages ABAC, which is the financial and accounting application set up by the Commission, to monitor the execution of its budget and to prepare its accounts. DG BUDG is a processor for all data processing in ABAC, except for processing activities where joint controllership has been established (see above)⁵.
- The European Research Council Executive Agency (ERCEA) which manages Bluebell and Speedwell⁶.

³Ares(2025)807817- 03/02/2025

⁴Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, OJ L 119, 4.5.2016, p. 1–88)

⁵SLA Appendix 5a – Ares(2020)1332073- 03/03/2020

⁶SLA – Ares(2022)1738813 – 09/03/2022



How long do we keep your data?

The EIT will keep your personal data for a period during which the EIT must preserve a file based on its administrative usefulness and the statutory and legal obligations linked to it according to the EIT Decision No. 35/2021 depending on the category of data, as follows:

Files (including the personal data contained) relating to financial and budget management are to be retained for a period of 7 years from the date of closure of the file. However, personal data contained in these files are also kept until the end of a possible audit if it started before the end of the above-mentioned period.

For the data stored in ABAC, please see the corresponding data protection record (section retention period): <https://ec.europa.eu/dpo-register/detail/DPR-EC-00301.3>

What are the rights of the data subject?

In accordance with Articles 15, 17, 18, 19 of the Data Protection Regulation of European Institutions the data subjects have the **right for information**, the **right of access**, the **right of rectification** in case their personal data is not complete or not accurate and the **right to erasure** (“right to be forgotten”).

The data subjects have the right to obtain the **erasure** of their personal data in accordance with Article 19 of the Regulation and in particular in the cases when the personal data are no longer necessary in relation to the purposes for which they were collected, if the data subject withdraws its consent, or in case of unlawful processing.

Data subjects have also the **right to restriction** of processing of personal data in accordance with Article 20 of the Regulation, and the **right to object** on grounds listed in Article 23 of the Regulation.

The rights can be only exercised by sending a request in a written form to the EIT-FINANCE@eit.europa.eu. As a general rule, the requests for information, access, rectification, erasure, restriction are handled without undue delay and in any event within one month of receipt of the request; this period may be extended by further two months where necessary, taking into account the complexity and number of requests. In case the data subject contests the accuracy of the data, upon request, the data is restricted immediately for the period of verification of the accuracy of the data.

Restrictions to the rights of data subjects may be applied by the EIT, in accordance with Article 25 of the Data Protection Regulation of the European institutions and the EIT internal rules on restrictions⁷.

Who should be contacted in case of queries or complaints?

If you have any queries concerning the processing of your personal data, you may address them to the following email: EIT-FINANCE@eit.europa.eu

⁷ <https://eit.europa.eu/who-we-are/legal-framework/data-protection>



You have the right of recourse at any time to the EIT's Data Protection Officer (EIT-DPO@eit.europa.eu) and to the European Data Protection Supervisor (EDPS@edps.europa.eu) or contact the site: <http://www.edps.europa.eu/EDPSWEB/>.

Legal basis of the processing operation

General legal basis:

- Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community and Staff Regulations of Officials of the European Union ('Staff Regulations') and the Conditions of Employment of Other Servants of the European Union ('CEOS'), laid down by Council Regulation (EEC, Euratom, ECSC) No 259/68⁸
- 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)⁹

Specific EIT legal basis:

- Service level agreement between the Service of the European Commission (DG DIGIT) and the European Institute of Innovation and Technology¹⁰
- Service Level Agreement between the European Research Council Executive Agency (ERCEA) and European Institute of Innovation and Technology¹¹
- EIT Decision 05/2025 on Financial Circuits and Delegation of functions¹²

Grounds for lawfulness

In line with Article 5. 1 (b) of Regulation No. (EU) 2018/1725, the processing is necessary for compliance with a legal obligation to which the controller is subject, namely under 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).¹³

⁸ OJ L 56, 4.3.1968, p. 1, last amended by Regulation (EU, Euratom) No 1023/2013 of the European Parliament and of the Council of 22 October 2013, OJ L 287, 29.10.2013, p.15.

⁹ OJ L, 2024/2509, 26.9.2024

¹⁰ Ares(2020)1332073- 03/03/2020

¹¹ Ares(2022)1738813 – 09/03/2022

¹² Ares(2025)807817- 03/02/2025

¹³ OJ L, 2024/2509, 26.9.2024