

EUPOL COPPS Privacy Statement

FOR THE PURPOSE OF

PROCESSING PERSONAL DATA RELATED TO FINANCIAL TRANSACTIONS

BY THE EU MISSION FOR THE SUPPORT OF PALESTINIAN POLICE AND RULE OF LAW (EUPOL COPPS)

1. INTRODUCTION

THE PROTECTION OF YOUR PRIVACY INCLUDING YOUR PERSONAL DATA IS OF GREAT IMPORTANCE TO THE EUROPEAN UNION AND TO CSDP MISSIONS. WHEN PROCESSING PERSONAL DATA WE REFLECT THE PROVISIONS OF THE CHARTER ON FUNDAMENTAL RIGHTS OF THE EUROPEAN UNION, AND IN PARTICULAR ITS ART. 8. THIS PRIVACY STATEMENT DESCRIBES HOW THE CSDP MISSION PROCESSES YOUR PERSONAL DATA FOR THE PURPOSE IT HAS BEEN COLLECTED AND WHAT RIGHTS YOU HAVE AS A DATA SUBJECT. YOUR PERSONAL DATA ARE PROCESSED IN ACCORDANCE WITH THE PRINCIPLES AND PROVISIONS LAID DOWN IN THE PERTINENT LEGISLATION ON DATA PROTECTION, INCLUDING THE REGULATION (EC) 45/2001 ON THE PROTECTION OF INDIVIDUALS WITH REGARD TO THE PROCESSING OF PERSONAL DATA BY THE COMMUNITY INSTITUTIONS AND BODIES AND ON THE FREE MOVEMENT OF SUCH DATA AND ITS SUCCESSIVE LEGISLATIVE ACT. ALL DATA OF A PERSONAL NATURE - NAMELY DATA THAT CAN IDENTIFY YOU DIRECTLY OR INDIRECTLY - WILL BE HANDLED FAIRLY AND LAWFULLY WITH THE NECESSARY CARE.

2. PURPOSE OF THE PROCESSING OPERATION

Financial transactions in EUPOL COPPS are to ensure the payment of entitlements for mission members and other persons/companies/tenderers. Financial actions further aim to ensure that the implementation of EUPOL COPPS' budget is in accordance to Financial Regulations and in line with principle of sound financial management.

3. DATA PROCESSED

Personal data which may be processed during the financial transactions:

I. Payments to mission members and calculation of taxes for the purpose of implementation of the Palestinian legislation:

- surname(s), middle name(s) and first name(s)
- date and place of birth
- contact details (such as email, phone number, address)
- estimated arrival date, arrival date to the Mission
- start and end of contract date
- position title and number at EUAM
- department and equivalent
- location of deployment
- regime (seconded or contracted)
- group category (local staff)
- declaration of residence (international contracted only)
- mission ID number
- mission email
- salary (amount, currency)
- grading of contracted mission members
- amount of per diem (international staff members)
- bank account details
- tax registration certificate: issue date, ID number (local contracted)
- insurance starting and ending dates
- beneficiaries (EUAM and CIGNA) – names and relation of dependents
- insurance enrolment of staff member's family members: name, date of birth, relation
- unpaid leave days
- travel arrangements paid by the mission (such as dates, accommodation, flight ticket, itinerary)
- number of used sick leave days
- redeployment information like dates, place
- check out information: information if a mission member has returned signed assets and do not have or have
- pending payments to the Mission
- Sick leave certificates for local staff and HoM's decision for international staff in case of excess sick leave leads to adjustment to the entitlements (without health information)
- Pregnancy confirmation certificates.

II. Payments to persons other than mission members

- Passport and ID card information: name, gender, date and place of birth, nationality, passport or ID card number, issuing and expiry dates,
- contact details (such as email, phone number, address)
- professional function, position title
- place of work
- amount of travel entitlements
- bank account details
- tax registration ID number
- travel arrangements paid by the mission (such as dates, accommodation, transport tickets, itinerary).

III. Payments for supplies, services and works

- name, age, gender, date of birth, nationality, passport number, ID number and professional function of natural person receiving payment
- contact details (e-mail address, telephone number, fax number, address, company and department, website/internet address) of natural person receiving payment
- bank account details (such as: bank name, address, IBAN and BIC codes)
- Tax ID no
- residence address, Marital Status and Passport information of the Mission's Authorising and Accounting Officers.

IV. Value Added Tax (VAT)

- MFA accreditation details (name, date of birth, gender, card number, issuing and expiry date and photo image)
- receipts, invoices provided by international mission members with the monthly claim of private VAT
- limited debit/credit card details used for the payment

Appropriate organisational and technical security measures will be ensured according to the data protection legislation applicable to EU institutions and bodies.

Outline of Security Measures

Electronic Files: The collected personal data are stored on the servers that abide by the pertinent security rules. Personal data will be processed by assigned staff members. Files will have authorised access. Measures are provided to prevent non-responsible entities from accessing data. General access to all collected personal data and all related information is only possible to the recipients with a UserID/Password.

Physical Files: When not in use, physical copies of the collected personal data will be stored in a properly secured and locked storage container.

Technical and organisational measures are also guaranteed and the appropriate provisions on security of the successor regulation on data protection for EU institutions and bodies in order:

- to prevent any unauthorised person from gaining access to computer systems; any unauthorised reading, copying, alteration or removal of storage media; any unauthorised memory inputs; any unauthorised disclosure, alteration or erasure of stored personal data; unauthorised persons from using data-processing systems by means of data transmission facilities;
- to ensure that authorised users of a data-processing system can access no personal data other than those to which their access right refers; the possibility to check logs; and that personal data being processed on behalf of third parties can be processed only on instruction of the controller; furthermore that, during communication or transport of personal data, the data cannot be read, copied or erased without authorisation;
- to record which personal data have been communicated, at what times and to whom.

4. CONTROLLER OF THE PROCESSING OPERATION

The Controller determining the purpose and the means of the processing operation is EUPOL COPPS. Mission's Finance Unit is responsible for managing the personal data processing operation which is under the supervision of the *Acting Head of Mission Katja Dominik*.

5. RECIPIENTS OF THE DATA

Recipients of personal data may be:

- EUPOL COPPS' staff working in Finance Unit;
- EUPOL COPPS' staff working in Procurement Unit (only related to tenders);
- EUPOL COPPS' Verification Officer;
- EUPOL COPPS' Authorizing Officers;
- External Auditors from various EU bodies or as appointed by EU Commission;
- Arab Bank;
- KBC Bank;
- Ernst&Young for calculation of taxes to be paid by EUPOL COPPS' local staff;
- MFA and relevant financial institutions for processing of VAT refund in Palestine and Israel.

6. PROVISION, ACCESS AND RECTIFICATION OF THE DATA

You have the right to access your personal data and the right to correct any inaccurate or incomplete personal data, as well as to request the removal of your personal data, if collected unlawfully, which will be implemented within 10 working days after your request will have been deemed legitimate. If you have any queries concerning the processing of your personal data, you may address them to the functional mailbox: data-protection@eupolcopps.eu

7. LEGAL BASIS FOR THE PROCESSING OPERATION

Legal basis:

- Council Joint Action 2005/797/CFSP of 14 November 2005 on the European Union Police Mission for the Palestinian Territories as amended by Council Decision 2013/354/CFSP.
- Exchange of Letters between High Representative of EU and Government of Israel dated 24 December 2007 and the subsequent letters extending the mandate.
- Exchange of Letters between High Representative of EU and the Palestinian Authority dated 20 April 20 and the subsequent letters extending the mandate.
- European Commission Service for Foreign Policy Instruments Vademecum on Financial and Accounting Procedures for CSDP Missions (ver. 1.0, 19 March 2018).
- EU Financial Regulations and Rules of Applications (2018).
- CONTRIBUTION AGREEMENT in the framework of EUROPEAN UNION COMMON Foreign and Security Policy (CFSP) for CSDP Missions, Reference number 'CFSP/2020/28/EUPOL COPPS'.
- SOP on Financial Rules.
- Civilian Operations Commander Instruction 12/2018 on the SOP on Personal Data Processing.
- SOP on Personal Data Protection (SOP/02).

8. TIME LIMIT FOR STORING DATA

Files related to financial transactions are to be retained in the archive for the period of 10 years following the discharge of financial exercise or until the end of a possible audit if it is started before the end of the 10 years period.

9. DATA PROTECTION CONTACT: MISSION DATA PROTECTION ADVISOR

In case you have questions related to the protection of your personal data, you can also contact the Mission Data Protection Advisor (MDPA) at the functional mailbox of the mission data-protection@eupolcopps.eu

10. RECOURSE

You have at any time the right of recourse that you may send to the Head of the Mission within EUPOL COPPS, with the MDPA (Legal Advisor) in copy.