



European Committee
of the Regions

Data Protection Notice

Business Partners

1. Introduction

The European Committee of the Regions (CoR) is committed to respecting and protecting your personal data in accordance with [Regulation \(EU\) 2018/1725 \(EUDPR\)](#).

All the third parties having financial and contractual transactions with an EU institution, body or agency using SUMMA must be first registered in the official budgetary and accounting system.

The [Business Partner's form](#) is a structured document used in the central financial management system - SUMMA (and its predecessor ABAC) to manage and record information (legal and banking data) about third parties.

2. Who is responsible for the processing of personal data?

The controller is the European Committee of the Regions (CoR).

The delegated controller is CoR Unit E4-Financial Management.

Email: Finance-CoR@cor.europa.eu

3. What is the purpose of the processing?

The processing of Business Partners aims to create a single, validated record for each third party uniquely identified.

Business partner's data is required to process payments and manage recoveries.

It ensures proper identification of third parties and reliable banking data.

4. What is the legal basis for the processing?

The Financial Regulation requires the central registration of legal entities and the 'bank accounts' linked to them. Specifically, Article 86(3) provides that *'the accounting officer may only make payments if the payee's legal entity and payment details have first been entered in a common file by the Union institution for which the accounting officer is responsible.'*

The legal basis for the processing of personal data is Article 5(1)(a) and Article 5(1)(b) of the EUDPR, according to which processing is necessary:

- a) 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; and
- b) for compliance with a legal obligation to which the controller is subject.

5. What personal data are processed?

We process your following data:

- Identification data: surname, first name, postal/email address, VAT/registration number, function or role
- Bank account data: name and surname of the holder, bank account number, IBAN, bank name and address
- Copy of the identity card and data on the identity card

6. Who are the recipients or categories of recipients of your personal data?

Personal data are accessible to financial actors who are duly authorised to access the accounting system SUMMA.

Access to personal data is strictly limited to what is necessary for the performance of tasks in accordance with the principle of need-to-know and based on predefined access profiles. All users granted access to SUMMA may consult limited personal data relating to natural persons (namely first and last name, country, and date of birth) solely for the purpose of ensuring the unique identification of legal entities and detecting potential duplicates in the system.

The determination of the need-to-know and the allocation of access rights are carried out under the responsibility of the Secretary-General, based on predefined access profiles. Access rights are regularly reviewed and are promptly withdrawn where they are no longer necessary.

Personal data relating to the target groups 'staff' and 'non-statutory staff' are subject to enhanced protection due to their sensitive nature. Access to such data is restricted to users who have been granted a "confidential" access level and is subject to the express prior written authorisation of the Director for Finance.

7. Are your personal data transferred to a third country or international organisation?

No, your personal data are not transferred to non-EU Member States or to international organisations.

8. How can you exercise your rights?

You have the right to access your personal data, to rectify any inaccurate or incomplete data, to limit (under certain conditions) the processing of your personal data, to object to their processing and to request that they be deleted (in the event of unlawful processing).

Where applicable, you have the right to receive your personal data as transmitted to the controller or to have it transferred directly to another controller (data portability).

You can send your requests to Finance-CoR@cor.europa.eu. Any request will be processed without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary.

You have the right of recourse to the European Data Protection Supervisor. You can contact them by using their [contact page](#) if you consider that your rights under the EUDPR have been infringed as a result of the processing of your personal data by the CoR.

9. How long are your personal data kept for?

In accordance with a legal obligation (Belgian Code of Economic Law) and taking into account the European Parliament's discharge of the CoR's budget for the budgetary year in which the transaction was carried out, data in the ABAC/SUMMA Tool are retained for 10 years.

10. Are the personal data collected used for automated decision-making, including profiling?

No, the CoR will not use your personal data to make automated decisions about you. "Automated decisions" are defined as decisions made without human intervention.

11. Will your personal data be further processed for a purpose other than that for which data have been obtained?

No, your personal data will not be further processed for a different purpose.

12. Who do I contact if I have queries or complaints?

If you have any further questions about the processing of your personal data, please contact the data controller Finance-CoR@cor.europa.eu.

You may also contact the CoR data protection officer (data.protection@cor.europa.eu) and/or the European Data Protection Supervisor [contact page](#) at any time.