

Notification to the Data Protection Officer under Article 25 of the Rules on Data Protection (Decision 235/16/COL) ('the Rules')

Changes affecting the information contained in the notification must be notified promptly to the Data Protection Officer, see Article 25(3) of the Rules.

Date of submission: 11.10.2017

Document: 876300

Part 1: Processing

- Unit responsible for the processing operation

Administration.

- Name of processing operation

Application for ING Corporate Cards ING Bank N.V. and booking of the credit card statements.

- General description of the processing operation

ESA collects personal data to apply for an ING Corporate Card and load the credit card statements in the ESA accounting software Dynamics AX.

- Sub-contractors

Non applicable.

- Automated / Manual operations

ESA collects and uses ESA staff members' personal data.

- Storage

All documents are saved under the Authority's database (GoPro) and hard copies of the credit cards and applications are saved in a folder in the Finance officer's office. Credit card statements are kept in the Finance Officer's office.

- Comments

Non applicable.

- Security measures

All documents are saved under the Authority's database (GoPro), Cases 72983 and 80164. They are only available to the group Administration confidential. Hard copies of the credit

cards and applications are saved in a folder in a file cabinet in the Finance Officer's office. The office is locked when the Finance Officer is not present in the office.

Part 2: Purpose and legal basis

- The purpose(s) of the processing operation

In order to provide ESA staff members with Corporate Credit Cards, there is a need to collect the personal data to fulfil the obligations ING has for the application process. In order to fulfil accounting obligations, credit card statements are booked in the ESA accounting system.

- The legal basis of the processing operation

Reference is made to the EFTA Surveillance Authority Decision of 15 December 2016 laying down Rules on Data protection (Doc. 802433) Article 5 b.

Part 3: Data subjects/fields

- Categories of data subjects

ESA staff members.

- Categories of data / Data fields

Name, (email) address, date of birth, phone numbers of cardholders, programme administrators and legal representatives.

Part 4: Rights of the data subjects

- Information to be provided to the data subjects

To be coordinated with the HR department / privacy statement - sent to the staff member prior to the signature of his/her contract.

- Procedure to grant rights

Authority procedure for data subject access requests (DSAR) (document no 863894).

- Retention policy and time limit

The digital documents and the hard copies should be destroyed right after the last day of contract of the ESA staff member.

The data are not used for statistical or scientific purposes.

Part 5: Recipients

- Categories of recipients of the data

ING Nederland.

- Transfer of the data

The data is transferred to ING Nederland and they are covered by the European Directive 95-46.