



PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data.

Processing operation: Processing of personal data within the framework of accounting, treasury, Business Partner registration, and related financial transactions in the European Commission's Accounting System (SUMMA).

Record reference: DPO-04-10 and DPO-04-11

Table of contents

1. Introduction	2
2. Controller/ Joint controllers/Processors.....	2
3. Why and how do we process your personal data?	3
4. Categories of data subjects	4
5. Which personal data do we collect and further process and on which legal grounds?	5
6. Who has access to your personal data and to whom is it disclosed?	6
7. How long do we retain your personal data?	7
8. How do we protect and safeguard your personal data?	7
9. Transfer to a third country or international organisation.....	7
10. What are your rights and how to exercise them?	8
11. Where to find more detailed information?	9

1. Introduction

The protection of your privacy is of high importance to Global Health EDCTP3 Joint Undertaking (hereinafter referred to as Global Health EDCTP3 JU). Global Health EDCTP3 JU is committed to respecting and protecting your personal data and ensuring your privacy rights.

All personal data processed within the framework of the provision of accounting and treasury services, including the registration of Business Partners (legal entities and bank account records) and related financial transactions, in the European Commission's central Accounting System (SUMMA) at Global Health EDCTP3 JU, namely data that can identify you directly or indirectly, will be processed fairly, lawfully, and with due care. This processing operation is subject to Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of individuals regarding the processing of personal data by the Union institutions, bodies, offices, and agencies and on the free movement of such data. The information in this communication is given pursuant to Articles 15 and 16 of Regulation (EU) 2018/1725.

2. **This Privacy Statement explains how Global Health EDCTP3 JU collects, uses, protects and processes your personal data in the context of the provision of accounting and treasury services through the European Commission's central Accounting System (SUMMA), including the registration of Business Partners and the execution of related financial transactions.**

3. Controller/ Joint controllers/Processors

The relevant processing operation is under the responsibility of the Executive Director of the Global Health EDCTP3 JU, acting as the Data Controller. Your personal data are processed based on applicable data protection legislation by Global Health EDCTP3 JU, Avenue de la Toison d'Or 56-60, 1060 Brussels, Belgium. The Global Health EDCTP3 JU can be contacted by post at following address TO 56, 1049 Brussels, Belgium or by email at Info@global-health-edctp3.europa.eu.

Global Health EDCTP3 JU has appointed a Data Protection Officer (DPO). The task of the DPO is to ensure, in an independent manner, that Global Health EDCTP3 JU complies with the data protection law and protects individuals' rights and freedoms by effectively protecting their personal data. The DPO of Global Health EDCTP3 JU can be contacted by post at following address TO 56, 1049 Brussels, Belgium or by email at data-protection@global-health-edctp3.europa.eu.

In order to have access to the relevant SUMMA tool, a Service Level Agreement was signed between the Global Health EDCTP3 JU and the European Commission (DG BUDG).

Under this framework, the roles of the parties differ depending on the processing activity concerned:

- For the provision of accounting and treasury services through SUMMA, the European Commission acts as a processor on behalf of Global Health EDCTP3 JU, which acts as the controller. In this context, the European Commission supports Global Health EDCTP3 JU to ensure access to the relevant SUMMA tool to carry out accountancy and treasury services.

- For the registration and management of Business Partners (legal entities and bank account records) and related financial transactions in SUMMA, Global Health EDCTP3 JU and the European Commission act as joint controllers. The respective roles and responsibilities of the parties are defined in a Joint Controllershship Arrangement in accordance with Regulation (EU) 2018/1725. The European Commission manages SUMMA as the central system and defines the related rules, system architecture, and mandatory registration requirements, while GH EDCTP3 JU determines which Business Partners must be registered in SUMMA and collects the documentation and personal data necessary for their registration and subsequent financial transactions. These activities are complementary and intrinsically linked, as the processing carried out by GH EDCTP3 JU could not take place without the SUMMA system managed by the European Commission.

Further information on the processing carried out by the European Commission is available in the European Commission's data protection notice [DPR-EC-00301.5](#).

SAP SE (address: Dietmar-Hopp-Allee 16, Walldorf, Baden-Württemberg, Germany) provides the ERP platform on which SUMMA is built and acts therefore a processor.

4. Why and how do we process your personal data?

For the provision of accounting and treasury services through SUMMA, Global Health EDCTP3 JU processes your personal data for the purposes of managing and ensuring the proper execution of accounting and treasury activities. Such processing may relate to financial and administrative transactions, including legal commitments, purchase orders, contracts, invoices, payments, credit notes, recovery orders, and staff-related payments, such as mission reimbursements, salaries, allowances and medical reimbursements.

Additionally, in the context of Financial and contractual transactions undertaken by the JU and by the client, the processing operation consists of the following processing activities:

- the identification of a unique Business Partner record corresponding to a single account. Personal data collected and stored in SUMMA are necessary to ascertain the legal existence of the entities and to be able to ascertain that no doubles exist in the file;
- the execution of payments towards these entities and the registration and management of related financial transactions (including the recovering of overdue receivable amounts), in compliance with the Financial Regulation.

In particular, Global Health EDCTP3 JU collects your data for the following purposes: registration and related financial transactions of Business Partners (legal entities and bank account records) in the central European Commission's Accounting System SUMMA (hereafter, 'processing operation'). Legal Entities can be private law bodies, public law bodies or natural persons. The purpose of this processing operation is to cover the full cycle required for executing a payment to a data subject (natural person), from the creation of a legal entity record to the management of related financial transactions, in compliance with the Financial Regulation.

The transactions may involve the following: legal commitment, purchase order, contract, invoices, payments; credit note, recovery order; staff related payments (e.g. missions reimbursements, salaries, allowances, medical reimbursement, etc.);

The Legal Entity/Business Partner records are created in the accounting system on the basis of a request introduced by Commission departments and Global Health EDCTP3 JU, acting as joint-controller, and are accompanied by relevant supporting documents provided by the data subject. These supporting documents are copies of ID documents and a "Legal Entity Identification Form" completed and signed by the data subject.

Similarly, the Global Health EDCTP3 JU is collecting Bank Account related data in order to execute payments towards data subjects registered in the system. In this case, supporting documents are bank statements and a "Financial Identification Form" completed and signed by the third party.

All financial transactions of the data subjects are also recorded in the accounting system by Global Health EDCTP3 JU.

Once payments are done, personal data might be processed later in case of recovery of overdue debts. In case a recovery order becomes overdue, Global Health EDCTP3 JU collects and processes the relevant information on debtors in order to properly perform legally binding activities to protect the financial interests of the EU. In particular, it identifies addresses used for the various correspondence (i.e. reminder letters, formal notices, lodgement of claims) and financial data to conduct risk analysis on debtors.

In line with Article 38 of the Financial Regulation, personal data may also be disclosed to the general public through the Financial Transparency System (FTS) website. According to the Financial Regulation, only financial commitments above €15,000 will be published, primarily relating to grant and procurement contracts. In such cases, only a limited set of data is published, namely the name of the beneficiary, the region, and the amount awarded. This publication is limited to a period of two years. The following categories of expenditure are excluded from publication: scholarships, direct support to natural persons most in need, payments to research and development experts, reimbursement of travel and subsistence expenses for experts, and staff-related expenditure.

On the one hand, personal data related to the identification of data subject and its bank accounts are collected directly from the data subject. The financial transactions attached the data subject are instead registered by the Global Health EDCTP3 JU in line with the contract signed between the data subject and the JU. On the other hand, during a dunning procedure, agents can manually update information in the dunning action log that SUMMA does not obtain directly from data subjects. This includes financial solvency details from sources such as credit enquiry agencies, specialised newspapers and publicly available information about the debtor, as well as correspondence with law firms, liquidators and tribunals, among others.

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

5. Categories of data subjects

For the provision of accounting and treasury services through SUMMA, the categories of data subjects include all natural persons who currently have, or have previously had, contractual and/or financial transactions with Global Health EDCTP3 JU. This may include beneficiaries of Global Health EDCTP3 JU funds, citizens, contractors, experts, staff members, and candidates participating in recruitment procedures.

Additionally, in the context of financial and contractual transactions carried out by Global Health EDCTP3 JU and its clients, this processing operation applies to the following categories of data subjects:

- Internal data subjects: natural persons internal to the organisation who currently have, or have previously had, contractual and/or financial transactions with Global Health EDCTP3 JU, such as staff members;
- External data subjects: natural persons external to the organisation who currently have, or have previously had, contractual and/or financial transactions with Global Health EDCTP3 JU, such as external contractors.

6. Which personal data do we collect and further process and on which legal grounds?

Global Health EDCTP3 JU collects various categories of data:

- Name, first name, permanent address, identity card/passport number or the number of another accepted identity document, personal number (for certain countries)
- NUP number (Numéro Unique de Personnel/ Unique Personal Number for staff only)
- PerID (for staff only): *Personal Identification number*
A unique internal ID assigned to staff working for EU institutions.
- Date/place/country of birth, email address, phone number
- Legal & budgetary commitments, payments, bank account number, bank account name, address declared to the bank, copy of ID document, signature, payment currency, bank statement
- In case the dunning procedure is initiated, the information on the recovery order, dunning logs including court judgement, bankruptcy order or any relevant dunning related documents.

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, in accordance with Article 5(1)(a) of Regulation (EU) 2018/1725 as well as based on Council Regulation 2021/2085 of 19 November 2021 establishing the Joint Undertakings under Horizon Europe, the Governing Board Decision 22/2022 establishing the financial rules of Global Health EDCTP3 JU and the 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).

Additionally, in the context of financial and contractual transactions carried out by Global Health EDCTP3 JU and its clients, Global Health EDCTP3 JU also processes data the compliance with a legal obligation to which the controller is subject according to Article 5(1)(b) of Regulation (EU) 2018/1725, and of the 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), also referred to as Financial Regulation (FR), and in particular:

- Articles 33 up to 38 laying down the rules of sound financial management including registration, retention, publication and deletion of personal data.
- Articles 86 and 82(10) laying down the powers and duties of the Accounting Officer with respect to the creation and management of legal entity files and for the keeping of supporting documents.
- Chapter 6 laying down the powers and duties of the Accounting Officer with respect to recovery of due amounts.

It may also process data performing transactions related to a contract to which the data subject is party, or to take steps at its request prior to entering a contract with the institution services, according to Article 5(1)(c) of Regulation (EU) 2018/1725. In case of absence of this processing, no contracts with or financing decisions in favour of the data subject could be concluded and no monitoring of the correct execution of these contracts/decisions would be possible.

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

6.1 Holders of access rights

The accessibility of personal data is strictly controlled based on the type of data and the purpose for which it is processed. Access to this data is granted solely on a need-to-know basis, ensuring that only authorized personnel are within:

- Personal data may be transferred to internal audit services, to the Court of Auditors or to the European Anti-Fraud Office (OLAF) for audit and fraud investigation purposes.
- Global Health EDCTP3 JU Administration & Financial staff.

This policy helps to protect the confidentiality and integrity of your data, minimizing the risk of unauthorized access.

Additionally, in the context of financial and contractual transactions carried out by Global Health EDCTP3 JU and its clients, in line with Article 38 of the Financial Regulation, personal data may also be disclosed to the general public through the Financial Transparency System (FTS) website, as explained above.

6.2 Recipients of the data

- European Commission and its services:
 - Directorate-General for Informatics (DG DIGIT)
- Global Health EDCTP3 JU Staff members:
 - Global Health EDCTP3 JU Administration & Financial staff
- SAP SE, as it provides the ERP platform on which SUMMA is built.
- Additionally, in the context of financial and contractual transactions carried out by Global Health EDCTP3 JU and its clients, further recipients of the data may be in scope as follows:
 - Any other third party: Auditing instances may access the personal data in the context of their respective audit missions.

- Through the Financial Transparency System (FTS), information encoded in "SUMMA" on beneficiaries under direct management is disclosed to the public through the Financial Transparency System website on Europa. Only certain funding awarded above €15 000 will be available. In case of natural persons, only the name, the region and the amount of funding awarded will be published (Art. 38(2) Financial Regulation).
- Financial institutions providing payment services (central banks, EU national treasuries, commercial banks) to the EC Treasury services may receive personal data in case the receipt of the payment is a natural person.

This policy helps to protect the confidentiality and integrity of your data, minimizing the risk of unauthorized access.

8. How long do we retain your personal data?

The administrative time limit(s) for keeping the personal data per data category

- Personal data related to Natural persons that are not staff/ ex-staff / NUP holders
Retention period: 10 years after last transaction
- Personal data related to: Staff / Ex-Staff and other NUP holders;
Retention period: A maximum of 100 years after the date of recruitment for JU staff (to satisfy any request that may come in after the end of a staff member's contract or after their retirement).

9. How do we protect and safeguard your personal data?

The Global Health EDCTP3 JU implements the following technical and organisational measures to safeguard your personal data:

- Appropriate technical and organisational security measures, giving due regard to the risks inherent in the processing and to the nature of the personal data concerned
- Data kept according to the security measures adopted by the European Commission
- Obligation of confidentiality of the staff, Staff dealing with this processing operation is designated on a need-to-know basis.
- Authentication and access control measures, additional protections at network level
- Security monitoring and periodic backups for potential restores.

10. Transfer to a third country or international organisation

The data transfer to countries outside of the EU or EEA is possible. Personal data (account holder name, IBAN, account holder address and amount) is only transferred to financial institutions located in the EU and European Economic Area (EEA) in order to enable payment transactions.

However, personal data may be subsequently transferred to other financial institutions outside the EU and European Economic Area (EEA) in order to enable payment transactions. This is the case when a natural person resides in an area outside the EU or EEA and that the data subject has requested to be paid in a bank which is outside of EU or EEA. Payments could be executed in any country in the world regardless of the compliance of this country with regards to data protection.

In cases where a transfer to a country outside the EU or EEA becomes necessary, such transfers will only take place in compliance with the applicable Chapter V (Articles 46-51) of Regulation

(EU) 2018/1725. This includes ensuring that an adequacy decision by the European Commission is in place, or, where this is not the case, implementing appropriate safeguards such as the EC Standard Contractual Clauses (SCCs) or other legally recognised mechanisms.

Where SCCs or other safeguards are used, Global Health EDCTP3 JU will assess and document whether the transferred data can remain adequately protected in practice and will apply supplementary technical and organisational measures when required (e.g., encryption, access controls).

If no adequacy decision or appropriate safeguards can ensure an essentially equivalent level of protection, transfers will only occur under the specific derogations provided by law and only when strictly necessary and proportionate.

There can be derogation(s) for specific situations in accordance with Article 50.1 (a) - (g). In the absence of an adequacy decision, or of appropriate safeguards, transfer of personal data to a third country or an international organisation is based on the following condition(s):

- The transfer is necessary for the performance of a contract between the data subject and the entity of the operational controller or the implementation of pre-contractual measures taken at the data subject's request
- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the entity of the operational controller and another natural or legal person
- The transfer is necessary for important reasons of public interest
- The transfer is necessary for the establishment, exercise or defense of legal claims
- The transfer is made from a register which, according to Union law, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down in Union law for consultation are fulfilled in the particular case

Personal data (account holder name, bank account, address and the amount) is only transferred to financial institutions located in the EU and European Economic Area (EEA) in order to enable payment transactions. However, personal data may be subsequently transferred to other financial institutions outside the EU and European Economic Area (EEA) in order to enable payment transactions. This the case when a natural person resides in an area outside the EU or EEA and that the data subject has requested to be paid in a bank which is outside of EU or EEA. It is necessary for executing the payment to the data subject. The decision on the location of the bank accounts is a decision of the data subject and not of the data controller.

11. What are your rights and how to exercise them?

As 'data subject' you have, under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, specific rights. In particular:

- You have the right to request access to all personal data processed by us pertaining to you.
- You have the right to rectification, i.e., to ask that any personal data pertaining to you that are inaccurate, be corrected.
- You have the right to withdraw your consent for processing of your personal data.

- You have the right to erasure, i.e., to request that personal data pertaining to you be deleted if these data are no longer required in the light of the purposes outlined above in Heading 3.
- You have the right to restriction instead of deletion, i.e., to request that we limit the processing of your personal data.
- you have the right not to be subject to a decision based solely on automated processing of data, including profiling, if such decision has legal effect on him or her, except for certain situations, such as entering a contract (as required by articles 14-16 & 24 of Regulation (EU) 2018/1725).
- You have the right to data portability, i.e., to receive from us in a structured, commonly used, and machine-readable format all personal data you have provided to us if the processing is based on your consent or a contract with you and the processing is carried out by automated means.

Pursuant to Article 25 of the Regulation, Global Health EDCTP3 JU has established internal policies that impose certain restrictions on these rights: the Governing Board of the Global Health EDCTP3 JU adopted Decision n. 18/2023, laying down internal rules concerning restrictions of certain rights of data subjects in relation to processing of personal data in the framework of the functioning of the Global Health EDCTP3 JU.

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 Global Health EDCTP3 JU's Data Protection Officer by post at the following address TO 56, 1049 Brussels or by email at data-protection@global-health-edctp3.europa.eu

The European Data Protection Supervisor (EDPS)

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 Global Health EDCTP3 JU, as a data subject, you have a right to recourse to the European Data Protection Supervisor (EDPS) at any time by e-mail to edps@edps.europa.eu or a letter to the EDPS postal address marked for the attention of the EDPS DPO:

European Data Protection Supervisor
Rue Wiertz 60
B-1047 Brussels
BELGIUM

For more information on the EDPS, please consult their website: <https://www.edps.europa.eu>.

12. Where to find more detailed information?

The Global Health EDCTP3 JU's Data Protection Officer (DPO) publishes the Register of all processing operations on personal data by the Global Health EDCTP3 JU on the website. The Register can be found [here](#).

This specific processing operation has been included in the Global Health EDCTP3 JU Public Register with the following Record reference: DPO-04-10 and DPO-04-11.