<table>
<thead>
<tr>
<th>Name of the data processing:</th>
<th>Reimbursement of travel expenses via the &quot;Phoenix&quot; IT application</th>
</tr>
</thead>
<tbody>
<tr>
<td>Created on</td>
<td>19/10/218</td>
</tr>
<tr>
<td>Last update</td>
<td></td>
</tr>
<tr>
<td>Reference number</td>
<td>019</td>
</tr>
<tr>
<td>Year</td>
<td>2018</td>
</tr>
<tr>
<td>1. Controller:</td>
<td>European Economic and Social Committee</td>
</tr>
<tr>
<td>2.a) Service responsible</td>
<td></td>
</tr>
<tr>
<td>2b) contact details</td>
<td><a href="mailto:reimbursements@eesc.europa.eu">reimbursements@eesc.europa.eu</a></td>
</tr>
<tr>
<td>3. Joint controller</td>
<td>Not applicable</td>
</tr>
<tr>
<td>4. DPO: contact details</td>
<td><a href="mailto:data.protection@eesc.europa.eu">data.protection@eesc.europa.eu</a></td>
</tr>
<tr>
<td>5. Processor(s) (where applicable)</td>
<td>The Committee's travel agency Carlson Wagonlit Travel (CWT)</td>
</tr>
</tbody>
</table>
The Committee's travel agency Carlson Wagonlit Travel (CWT) acts as the Committee's subcontractor for booking, issuing and invoicing tickets for travel in connection with Committee meetings in Brussels or elsewhere.

Data are processed by the travel agency in accordance with the applicable provisions concerning data protection (privacy statement available on https://www.mycwt.com/legal/global-privacy-policy/).

The provisions relating to marketing do not apply to EESC members, delegates, alternates and experts or to their assistants, if any. No marketing communications will be sent to them and the provisions concerning CWT’s online tools do not apply to them.

Marketing communications that may be of interest to the EESC will be sent by the travel agency to the Services to Members Unit (functional mailbox: reimbursements@eesc.europa.eu).

Contact: globalprivacy@carlsonwagonlit.com

EESC members are entitled to reimbursement of travel expenses for duly authorised journeys to and from the Committee's places of work. Travel expenses are reimbursed, and travel and subsistence allowances are also provided, to enable members to perform the tasks and duties their office entails.

Phoenix is a web application for making out payment orders once Committee members’ claims for reimbursement sent to the Services to Members Unit have been examined and processed. It can also be used for the processing and preparation of payment orders for invoices for members' trips issued by the Committee's travel agency, as well as various other payment orders under the rules in force.

Payment orders are then sent together in one envelope so they can then be forwarded to ABAC for validation by the authorising officer of the relevant budget item.

7. Description of the categories of persons whose data are processed

- EESC members and their alternates
- CCMI delegates and their alternates
- EESC experts
- Assistants to the above-mentioned beneficiaries

8. Description of data categories processed
Phoenix comprises various modules:

- **Members module** (i.e. members, delegates and experts; information relating to members: names, functions, section/group, country of origin)
- Clicking on a member's name provides access to all their personal data:
  - Name, gender, date of birth, contact addresses; addresses for financial purposes, telephone number, email addresses, knowledge of languages, offices held, bodies on which the member sits and has been appointed, member’s alternate; financial details (bank accounts), reimbursement declarations in the member’s name in the system, account balance with debits and credits (Finance), journeys relating to Committee meetings and travel agency invoices in the member’s name in the system; meetings to which the member is invited (Agenda) and payment means.
- **Meetings module** (to see the details of a Committee meeting to which the member has been duly invited)
- **Declaration module** (to search/see all declarations by a member; to create declaration details)
- **Envelope module** (to find different payment orders grouped by envelope)
- **Travel invoice module** (to view all the Committee travel agency invoices or additional operations (e.g. credit notes, ticket changes, etc.))
- **Documents module** (to see the list of available documents)
- **Miscellaneous payments module** (to send miscellaneous payments to ABAC for operations carried out under the current rules)
- **Reference data module** (this provides an overview of the different reference data in force when calculating reimbursements to members).

In keeping with the requirements of Article 48 of the rules of application of the financial rules, "the authorising officer shall set up paper based or electronic systems for the keeping of original supporting documents relating to and subsequent to budget implementation and budget implementation measures. The systems shall provide for: (...)"

d) such documents to be kept for at least five years from the date on which the European Parliament grants discharge for the budgetary year to which the documents relate;

Documents relating to operations not definitively closed shall be kept for longer than provided for in point (d) of the first paragraph, that is to say, until the end of the year following that in which the operations are closed.

Personal data contained in supporting documents shall be deleted where possible when those data are not necessary for budgetary discharge, control and audit purposes.
Services to Members and Finances and Financial Verification Units

The Committee's travel agency processes the data needed in order to issue the tickets requested by beneficiaries and to ensure proper invoicing and payment.

11. Transfers of personal data to a third country or an international organisation

Personal data are not sent to third countries (non-EU Member States) unless a reservation so requires (e.g. travel to a non-EU Member State).

In accordance with Carlson Wagonlit Travel's privacy policy, "As a global travel management service provider, [CWT] may transfer your personal data outside of the European Union and European Economic Area. Where we do so to any country not deemed a country of adequate protection by European Commissioners, we make sure such transfers are validated via the recognised European Standard Clauses (also known as 'European Model Clauses') so that your rights are safeguarded.

Given the international nature of CWT services, international personal data transfers are made throughout CWT, its affiliates, joint ventures and global partner network to support travel-related services such as airline ticket issuance and technical help-desk requests, as well as management of meetings and events.

In circumstances where personal data is transferred to, or centrally stored in, countries in which there is not a similar level of protection as in your country, CWT has, where relevant, taken steps to ensure an adequate level of protection of the transferred data by entering into appropriate inter-company data transfer agreements based on the European Standard Contractual Clauses (also known as EU Model Clauses)."

12. General description of security measures, where possible

Access to the Phoenix application is secured by a user name and password that must be entered when opening the application. The user name and password are stored in AD (Active Directory) and so are the same as the Windows identification data.

Users may have three different profiles within the application (initiating agent, verifier and read-only access).

Rights are allocated by the service that deals with ABAC rights.

13. Privacy statement

PHOENIX

Part 2
Compliance check and risk screening

1.a) Legal basis and reason for processing

✓ (a)
necessary 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

(b) necessary for compliance with a legal obligation to which the controller is subject (see point 1b) below

(c) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract

(d) the data subject has given consent to the processing of his or her personal data for one or more specific purposes

(e) necessary in order to protect the vital interests of the data subject or of another natural person

Tick (at least) one of the boxes

| 1b) Legal basis | Council Decision 2013/471/EU of 23 September 2013  
Decision of the EESC Bureau of 26 April 2016 |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Are the purposes specified, explicit and legitimate?</td>
<td>Yes</td>
</tr>
<tr>
<td>3. Where information is also processed for other purposes, are you sure that these are not incompatible with the initial purpose(s)?</td>
<td>Yes</td>
</tr>
<tr>
<td>4. Do you really need all the data items you plan to collect?</td>
<td>Yes, all the data are necessary.</td>
</tr>
<tr>
<td>5. How do you ensure that the information you process is accurate?</td>
<td>Data extracted from other databases (Agora) are regularly updated.</td>
</tr>
<tr>
<td>6. How do you rectify inaccurate information?</td>
<td>In the event that a member, alternate, delegate or expert asks for their data to be modified or deleted, they will be corrected or deleted as soon as possible and in any case within 15 days.</td>
</tr>
<tr>
<td>7. Are they limited according to the maxim &quot;as long as necessary, as short as possible&quot;?</td>
<td>Yes</td>
</tr>
<tr>
<td>8. If you need to store certain information for longer, can you split the storage periods?</td>
<td>No</td>
</tr>
<tr>
<td>9 How do you inform data subjects?</td>
<td></td>
</tr>
</tbody>
</table>

The EESC has drawn up a "Privacy statement" (attached) which has been published on the Members’ Portal. It sets out: the identity of the controller, the reason for the processing, the legal basis, the nature of the data collected, the data processing, the data recipients, rights to access, correction, blocking, deletion and objection, how long the data are to be kept, and appeals.

When a notice is sent on the subject, the link to the Privacy Statement is included in the message.

10. Access and other rights of persons whose data are processed

Data subjects are entitled to request access to their personal data. They also have the right to request modification or deletion of the data and to state their position, to object or to complain.

Members, alternates, delegates and experts wishing to request access, correction or deletion or to make an objection may contact the controller.

11. Does this process involve any of the following?

- [ ] (a) data relating to health, (suspected) criminal offences or other special categories of personal data
- [ ] (b) evaluation, automated decision-making or profiling
- [ ] (c) monitoring data subjects
- [ ] (d) new technologies that may be considered intrusive

Part 3
Linked documentation

1. Links to threshold assessment and DPIA (where applicable)
   - No hyperlink inserted

2. Where are your information security measures documented?
   - No hyperlink inserted

3. Links to other documentation
   - No hyperlink inserted

4. Other relevant documents
   - Privacy statement in FR