

EDPS RECOMMENDATION N. 7

FINANCIAL CHECKS TO BE RETAINED AS SHORTLY AS POSSIBLE AND ON A NEED TO KNOW BASIS

Map of indispensable financial data and users of this data

1. List of persons allowed to have access to data in FAR relevant for financial checks (ECRET Finance Team). The team is currently composed of 6 persons and additional staff members will be joining.
2. Necessary data for financial checks:
 - Charters:
 - ✓ Flight schedule
 - ✓ Flight number
 - ✓ PNR
 - ✓ Final report (FRO)
 - ✓ In some cases - debriefing form (incidents)
 - Scheduled flights:
 - ✓ Ticket number
 - ✓ PNR
 - ✓ FAR ID number
 - ✓ Flight schedule
3. How long should these data be accessible for financial verification?
 - Payments can be processed from the moment of validity of the commitment, until the end of the next year (n+1). However, each case is different and it is not possible to set one time frame for financial checks and payments due to exceptional cases.
4. How long should we keep the paper version of invoices, specifications and any other documents that might include personal data?
 - In general there are no personal data on the invoices. Only the specifications for scheduled flights' invoices include ticket numbers which are necessary for financial checks.
 - In case of audit, financial documents need to be kept for a minimum of 7 years from the date of payment. This includes the 5 year retention period under the Financial Regulation with an additional 2 years from the discharge process.
 - According to Frontex practice - paper versions of financial documents are archived but never destroyed in order to ensure that the information is accessible in an audit or litigation situation and to support the budgetary discharge.

Reminder email or disclaimer

'Staff handling financial data containing personal data shall ensure that this information is handled and stored in a secure manner. Staff shall ensure that this

data is only shared on a need to know basis and that no unauthorised copies or data transmission shall be made.'