



Record of processing activity

Corporate Credit Cards

Record of EBA activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 (EUDPR)

Nr	Item	Description
Part 1 - Article 31 Record (publicly available)		
1	Last update of this record	23/06/2022
2	Reference number	EBA/DPR/2022/12
3	Name and contact details of controller	<p>The European Banking Authority is the controller with regards to the internal procedure related to the request of the card and the control on the compliance with the related procedure.</p> <p>Postal address: Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France</p> <p>Contact: hrteam@eba.europa.eu</p> <p>Lufthansa AirPlus Servicekarten GmbH ('AirPlus') is a separate controller for the procedure concerning the financial transactions and the relationship with the different service providers involved. The processing operations directly managed by AirPlus concern the check on anti-money laundering and terror prevention, the credit worthiness check, credit limit and other specific procedures. For more information on personal data being processed by AirPlus please refer to its specific privacy statement, which will be provided once the applicant receives the online application link as mentioned above.</p> <p>Lufthansa AirPlus Servicekarten GmbH, Dornhofstraße 10, 63263 Neu-Isenburg, Germany ("AirPlus")</p> <p>Contact: dataprotection@airplus.com</p>
4	Name and contact details of DPO	dpo@eba.europa.eu
5	Name and contact details of joint controller (where applicable)	Not applicable

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6	Name and contact details of processor (where applicable)	Not applicable
7	Short description and purpose of the processing	<p>The EBA signed a framework contract (PMO2/PR/2014/084) for corporate credit cards for staff in 2015. The EBA provides its staff with a corporate credit card for expenses incurred on mission. As an accessory, this card can be used for other purposes, professional or private. This card is the preferred means of payment for paying any expenses incurred during mission.</p> <p>The corporate credit card is personal and non-transferable. In order to provide the corporate credit card, AirPlus collects and processes personal data of staff applying for this card.</p> <p>During the use of the corporate credit card, AirPlus collects and processes personal data necessary to enable transactions, to facilitate business travel related expenses, and to be able to create a structured statement for staff members. This includes technical information on the transaction itself, information on the merchant where the corporate credit card was used, any information the merchant provides (such as the purchased goods or services) as well as additional information provided by staff members.</p>
8	Description of categories of persons whose data the EBA processes and list of data categories	<p>The EBA processes the data of temporary and contract agents, and seconded national experts.</p> <p><u>EBA-HR provides the following data to Airplus</u></p> <ul style="list-style-type: none"> • To set up the main account at Airplus: EBA's IBAN account number, address; • Signatory's personal details (Executive Director): first name, surname, nationality, date and place of birth, email address, gender; • Program Manager: first name, surname; • Power of attorney document: Appointment letter by European Parliament of Francois-Louis Michaud as Executive Director; • List of staff requesting the corporate credit card: first name, surname, email address. <p><u>Staff members applying for the corporate credit card provide the following data to Airplus:</u></p> <ul style="list-style-type: none"> • First name, surname, gender, nationality, date of birth, mobile number, home address, bank account number. Confirmation of identification via video call may be needed.
9	Time limit for keeping the data	<p>AirPlus processes and saves personal data only to the extent required to fulfil the purpose for which it was collected. Data will be deleted once the purpose has been fulfilled, unless AirPlus has a legal obligation to retain that data (e.g. for trade or tax law requirements).</p>

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10	Recipients of the data	<p data-bbox="660 353 1391 474">AirPlus erases personal data of staff as soon as it is no longer needed for the aforementioned purposes. Personal data may also be saved for the period of time in which claims can be asserted against AirPlus.</p> <p data-bbox="660 497 1391 721">In addition, personal data will be saved to the extent to which and for those periods of time for which AirPlus is legally required to do so. The obligations regarding proof and retention are stipulated by local laws, including but not limited to Germany's Commercial Code (Handelsgesetzbuch), Fiscal Code (Abgabenordnung), and Anti-Money Laundering Act (Geldwäschegesetz). According to these laws, retention periods can be up to ten years.</p> <p data-bbox="660 743 1334 766">For further information please refer to Airplus' privacy notice.</p> <hr/> <p data-bbox="660 801 1391 869">The designated EBA HR staff member (Program manager for Airplus) has access to personal data.</p> <p data-bbox="660 891 1391 1012">AirPlus forwards personal data of staff members only to fulfil the respective business purpose, if mandated by law, or to service providers which have been contracted by AirPlus and are obligated to comply with applicable data protection regulations.</p> <p data-bbox="660 1034 1391 1214">AirPlus provides access to or shares personal data with carefully selected service providers. These service providers only handle personal data of staff members on behalf of AirPlus as so-called data processors, acting only on instructions given by AirPlus. Therefore, they are prohibited from using the data of staff members for their own business purposes.</p> <p data-bbox="660 1236 1391 1303">AirPlus shares the data under strict confidentiality obligations with the following categories of service providers:</p> <ul data-bbox="673 1326 1391 1518" style="list-style-type: none"> <li data-bbox="673 1326 1391 1384">• IT service providers (hosting and infrastructure services), located in Europe; <li data-bbox="673 1393 1391 1451">• Transaction-related service providers (receipt processing services), located in Europe; <li data-bbox="673 1460 1391 1518">• Customer relationship service providers (call centre services), located in Europe. <p data-bbox="660 1541 1391 1921">In order to provide the corporate credit card, corporate credit card data and information on each transaction will be exchanged between all parties involved in the relevant credit card service. This exchange of information is necessary to authorize the transaction and to pay for the purchased goods or services. The parties involved are the merchant, where the credit card is used, the acquirer of that merchant (usually their bank or service provider that provides the technical means to use a credit card), the credit card network (for example VISA or Mastercard) and the issuer (the party that provides the credit card to the individual, in this case AirPlus). This information is only used to enable the corporate credit card's payment functionality.</p> <p data-bbox="660 1944 1391 2033">AirPlus may also disclose personal data of staff members to trusted third parties who assist Airplus in providing the corporate credit card, as long as those parties agree to keep your personal data</p>

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		<p>confidential and comply with applicable data protection regulations.</p> <p>In addition to that, AirPlus may disclose personal data of staff members to the following categories of third parties:</p> <ul style="list-style-type: none"> • To external auditors in the event of audits or investigations, if there is a legal requirement or legitimate business interest to do so; • To insurance companies in case staff members wish to take advantage of the insurance cover available in connection with the corporate credit card; • To external lawyers in the context of legal claims, or to courts acting in their judicial capacity; • As required by law, AirPlus may share personal data with public authorities (e.g., the German Federal Financial Supervisory Authority and/or other national Financial Market Supervisory Authorities, Financial Authorities, the German Federal Central Tax Office and/or other national Tax Authorities).
		<p>For further information please refer to Airplus' privacy notice.</p>
11	<p>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</p>	<p>Personal data will be transferred to countries outside the European Union or the European Economic Area ("third countries") by AirPlus only to the extent required for the respective purpose (e.g. enabling transactions) or mandated by law (e.g. reporting duties stipulated by tax laws). Prior to any transfer of personal data to processors or third parties in third countries, AirPlus ensures that a transfer mechanism pursuant to GDPR is in place (e.g. the Model Clauses for the transfer of personal data to third countries provided by the European Commission).</p> <p>For more information, please refer to AirPlus' privacy statement. Transfers of the travel agency within its 'corporate family' are based on Art. 48(2)(d) of the Regulation (EU) 2018/1725 - Binding Corporate Rules (BCRs). Transfers are also based on Article 50(1)(b) of the Regulation (EU) 2018/1725, since 'the transfer is necessary for the performance of a contract between the data subject and the controller.</p>
12	<p>General description of security measures, where possible</p>	<p>AirPlus will forward personal data of staff members only to fulfil the respective business purpose, if mandated by law, or to service providers which have been contracted by AirPlus and are obligated to comply with applicable data protection regulations.</p> <p>AirPlus provides access to or shares personal data with carefully selected service providers. These service providers only handle personal data of staff members on behalf of AirPlus as so-called data processors, acting only on instructions given by AirPlus. Therefore, they are prohibited from using the data of staff members for their own business purposes.</p> <p>Prior to any transfer of personal data to processors or third parties in third countries, AirPlus ensures that a transfer mechanism pursuant to GDPR is in place (e.g. the Model Clauses for the transfer</p>

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		of personal data to third countries provided by the European Commission).
13	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	https://www.airplus.com/corporate/en/disclaimer-and-contact/privacy-statement/privacy-statement.html The EBA privacy notice is available on the EBA Intranet page.