



**PRIVACY STATEMENT – DATA PROTECTION NOTICE**  
**for the**  
**EUROPEAN UNION ADVISORY MISSION FOR CIVILIAN SECURITY SECTOR**  
**REFORM UKRAINE**  
**for processing of Finance Activities**

2025-EUAM-1470

**1. INTRODUCTION**

The protection of your privacy including your personal data is of great importance to the European Union and to European Union Advisory Mission for Civilian Security Sector Reform Ukraine (EUAM Ukraine). When processing personal data, we reflect the principles of the [Charter of Fundamental Rights of the European Union](#), and in particular the Article 8 on data protection.

This 'Data Protection Notice and Privacy Statement describes how EUAM Ukraine processes your personal data for the purpose for which it has been collected and what rights you have as a data subject.

Your personal data is collected, processed, and stored by EUAM Ukraine in accordance with the Civilian Operations Commander (CivOpsCdr) Instruction 17-2018 for CSDP Missions and its subsequent amendment(s) on the SOP on Personal Data Protection and in line with Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC as of 11 December 2018, aligned with provisions of the Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, GDPR), and repealing directive 95/46/EC.

All data of personal nature - data that can identify you directly or indirectly - is handled with the necessary care and according with the rules above.

**2. PURPOSE OF THE PROCESSING : Why do we process your data?**

The purpose of the data processing for finance activities is to ensure payment of entitlements for mission members and other persons, if applicable. In addition, to ensure that payments for supplies, services and works to EUAM Ukraine vendors are executed in compliance with the applicable rules and regulations. Data processing is also necessary to retain proper supporting documentation for all financial transactions, in order to claim Value Added Tax (VAT) reimbursement for the mission and for the international mission members.

**3. DATA PROCESSED: What data do we process?**

The data, including personal data, which may be processed for the purpose may be the following:

**1. Entitlements for mission members:**

- surname(s), middle name(s) and first name(s)
- date and place of birth
- contact details (such as email, phone number, address)
- estimated arrival date, arrival date to the Mission
- start and end of contract date
- position title and number at EUAM
- department and equivalent
- location of deployment
- regime (seconded or contracted)
- group category (local staff)
- declaration of residence (international contracted only)

- mission ID number
- mission email
- salary (amount, currency)
- grading of contracted mission members
- amount of per diem (international staff members)
- bank account details
- tax registration certificate: issue date, ID number (local contracted)
- insurance starting and ending dates
- beneficiaries (EUAM and CIGNA) – names and relation of dependents
- insurance enrolment of staff member's family members: name, date of birth, relation
- unpaid leave days
- travel arrangements paid by the mission (such as dates, accommodation, flight ticket, itinerary)
- number of used sick leave days
- redeployment information like dates, place
- check out information: information if a mission member has returned signed assets and do not have or have pending payments to the Mission
- Sick leave certificates for local staff and HoM's decision for international staff in case of excess sick leave leads to adjustment to the entitlements (without health information)
- Pregnancy confirmation certificates

## **2. Entitlements for other persons than mission members**

- Passport and ID card information: name, gender, date and place of birth, nationality, passport or ID card number, issuing and expiry dates,
- contact details (such as email, phone number, address)
- professional function, position title
- place of work
- amount of travel entitlements
- bank account details
- tax registration ID number
- travel arrangements paid by the mission (such as dates, accommodation, transport tickets, itinerary)

## **3. Payments for supplies, services and works**

- name, age, gender, date of birth, nationality, passport number, ID number and professional function of natural person receiving payment
- contact details (e-mail address, telephone number, fax number, address, company and department, website/internet address) of natural person receiving payment
- bank account details (such as: bank name, address, IBAN and BIC codes)
- Tax ID no
- residence address, Marital Status and Passport information of the Mission's Authorising and Accounting Officers

## **4. Value Added Tax (VAT)**

- MFA accreditation details (name, date of birth, gender, card number, issuing and expiry date and photo image)
- receipts, invoices provided by international mission members with the monthly claim of private VAT
- limited debit/credit card details used for the payment

## **4. DATA CONTROLLER: Who is entrusted with processing your data?**

The Controller determining the purpose and the means of the processing activity is EUAM Ukraine, represented by its Head of Mission as a Data Controller. The EUAM Ukraine responsible for managing the personal FINANCIAL data processing is Finance Section under the Mission Support Department, under the supervision of the Head of Mission.

## **5. RECIPIENTS OF THE PERSONAL DATA: Who has access to your data?**

The recipients of your data may be:

- Mission staff of the Finance Unit
- Mission ex-ante Verification Officers (except private VAT claims)
- Mission ex-post Financial Controller (except private VAT claims)
- Relevant Authorizing Officers of the Mission (except private VAT claims)
- External auditors from various EU bodies (Internal Audit Service, European Court of Auditors) or as appointed by EU Commission (except private VAT claims)
- European Commission FPI.3 Programme Manager and his/her Line Manager dedicated for EUAM Ukraine (except private VAT claims)
- Credit Agricole Bank (except private VAT claims)
- KBC Bank Brussels (except private VAT claims)

- EUAM Intranet, Microsoft Office 365 and Microsoft Navision Dynamics 365 Business Central developers to the extent necessary for trouble-shooting, debugging, customization and development purposes to the extent necessary in order to perform and provide services as per the existing contracts and SLAs
- State Fiscal Services of Ukraine with regard to VAT reimbursement

The given information will not be communicated to third parties, except where necessary for the purposes outlined above. Personal data is not intended to be transferred to a Third Country, unless explicitly stated in this Privacy Statement.

## **6. ACCESS, RECTIFICATION, ERASURE OF THE DATA: What rights do you have?**

You have the right to:

- information on what data is processed, for which purpose, by whom and with which parties the data are shared
- access your personal data
- request for correction of any inaccurate or incomplete personal data
- request the removal of your personal data, if collected unlawfully, which will be implemented within one month after your written request
- erasure of your data as stipulated under Section 8 of this Privacy Statement and when the data are no longer necessary for the purpose
- ask to restrict the processing of your data, if the data or the lawfulness of processing are contested.

EUAM Ukraine adheres to the principle of data minimization by collecting only the necessary data in order to fulfil the purpose. If you have any queries or concerns related to the processing of your personal data, you may address them to the following functional mailbox: [finance@euam-ukraine.eu](mailto:finance@euam-ukraine.eu)

## **7. LEGAL BASIS FOR THE PROCESSING OPERATION: On what grounds we collect your data?**

Legal basis:

- Council Decision 2014/486/CFSP, 22 July 2014, and its subsequent amendments;
- Operational Plan (OPLAN) 2024-2027 for the European Union Advisory Mission for Civilian Sector Reform in Ukraine (EUAM Ukraine) endorsed by Political and Security Committee (PSC) on 11 June 2024;
- Civilian Operations Commander Instruction 12/2018 of October 2018 on the Standard Operational Procedures (SOP) on Personal Data Protection;
- SOP on Personal Data Protection;
- European Commission Service for Foreign Policy Instruments Vademecum on Financial and Accounting procedures for CSDP Missions (Version 3.0, 28th November 2021), and as subsequently amended or replaced;
- EU Financial Regulations and Rules of Application (2024/2509), and as subsequently amended or replaced;
- Contribution Agreement no EUAM/2024/03/EUAM Ukraine;
- EUAM SOP on Finance and Accounting;
- Decree of Cabinet of Ministers of Ukraine dated 27 December 2010, no 1240 "On Approval of the Procedure for Exemption from Value Added Tax on the Supply and Import to the Customs Territory of Ukraine of Goods and Services Provided for the Own Needs of Diplomatic Missions, Consular Offices of Foreign States and Representations of International Organizations in Ukraine";
- Decrees of National Bank of Ukraine.

The processing is necessary for the execution of the EUAM Ukraine Mission mandate as described in Council Decision 2014/486/CFSP of 22 July 2014 and its subsequent amendments.

## **8. TIME LIMIT FOR STORING DATA: For what period and how we process your data?**

**Retention of data:**

Retention of data is carried out according to Article on "DOCUMENT MANAGEMENT AND ARCHIVES FOR FINANCIAL AND PROCUREMENT FILES of Vade-mecum":

As long as the EUAM Ukraine is on-going, it shall keep all original and electronic documents and files related to the Mission for:

- for a period of 5 years from the "End Date" (i.e. date when the final payment or final recovery of the mandate to which they relate is carried out) when it comes to documents under the current (new) CA;
- for a period of 7 years from the "End Date" when it comes to documents under the former (old) financial agreement; and
- any on-going audit, verification, appeal, litigation or pursuit of claim or investigation by the European Anti-Fraud Office (OLAF). If any such case is notified to the CSDP Mission, has been disposed of, the Mission shall keep and make available all relevant information. The receipts related to the private VAT claims shall be physically destroyed at the final closure of the respective mandate (budgetary period).

The related electronic records/files shall be deleted at the same time.

In case of security incident/criminal investigation concerned data is under specific legislation (Ukrainian or EU or EU Member State).

**Security of data:**

No artificial intelligence tools are used in the processing.

Appropriate technical and organisational measures are ensured:

- *Electronic format:* the data will be stored on the servers that abide by the pertinent security rules. Personal data will be processed by assigned staff members. Files have authorised access. Measures are provided to prevent non-responsible entities from accessing data. General access to all collected personal data and all related information is only possible to the recipients with a User ID/Password.
- *Physical Files:* When not in use, physical copies of the collected personal data will be stored in a properly secured and locked storage container.
- to prevent any unauthorised person from gaining access to computer systems; any unauthorised reading, copying, alteration or removal of storage media; any unauthorised memory inputs; any unauthorised disclosure, alteration or erasure of stored personal data; unauthorised persons from using data-processing systems by means of data transmission facilities;
- to ensure that authorised users of a data-processing system can access no personal data other than those to which their access right refers; the possibility to check logs; and that personal data being processed on behalf of third parties can be processed only on instruction of the controller; furthermore that, during communication or transport of personal data, the data cannot be read, copied or erased without authorisation;
- to record which personal data have been communicated, at what times and to whom.

**9. MISSION DATA PROTECTION ADVISOR: Any questions to MDPA?**

In case you have questions or concerns related to the protection of your personal data, you can also contact the Mission Data Protection Advisor (Legal Adviser) at [data.protection@euam-ukraine.eu](mailto:data.protection@euam-ukraine.eu)

**10. RECOURSE**

You have at any time the right to have recourse if you consider that your rights have been infringed as a result of the processing of your personal data. In relation to the data processed by EUAM Ukraine, you may send your complaint to the Mission Data Controller (the Head of the Mission) with the Mission Data Protection Adviser (MDPA), the Legal Adviser of the Mission in copy at [data.protection@euam.ukraine.eu](mailto:data.protection@euam.ukraine.eu) .

Publishing date: 15 April 2025