



EUROPEAN DATA PROTECTION SUPERVISOR

DELPHINE HAROU
HEAD OF UNIT
SUPERVISION AND ENFORCEMENT



European Commission
BU 25 - 3/145
B-1049 Brussels

Brussels, 19 April 2021

 D(2021) 0879 C 2019-1084
Please use edps@edps.europa.eu for all
correspondence

CONFIDENTIAL

Subject: Your complaint regarding the Commission's application "EC on the go" (case 2019-1084)

Dear Mr ,

We would like to inform you about the outcome of your complaint submitted to the EDPS on 26 November 2019 under Article 68 of Regulation (EU) 2018/1725¹ (the Regulation).

The issue you raised in your complaint concerned the fact that EU staff's payslips and their full bank account numbers are accessible on line via the Commission application "EC on the go".

On 10 February 2020, the EDPS asked the PMO under Article 57(1)(e) of the Regulation to provide comments on the issue that you had raised. On 26 August 2020, you submitted your comments on the PMO's reply and explained why you did not find it satisfying. On 30 October 2020, the EDPS pursued the investigation with the PMO on the basis of your further reflexions and arguments. On 15 December 2020, the PMO

¹ OJ L 295, 21.11.2018.



informed us that it had raised the issue with DG BUDG and DG HR, which concluded that there was no legal reason which would oblige PMO to indicate the full bank account number, and that it would, as a consequence, investigate how the information on the salary slips could be adapted.

On 23 March 2021, the PMO provided us with additional information and informed us that it intended to modify the payslips and the bank account numbers (see attached).

The PMO explained that following a technical investigation carried out by the PMO, DG HR and DG BUDG, it had been decided to adapt the display of the account number in the salary slips and only show the first two characters and the last four (instead of six):

‘Display on the salary/pension slips of the first two characters and of the last four and putting * in the remaining ones.
For example: bank account BE 12 123 1234567 12 => BE ** *** *****67 12’.

Since the pay application, NAP, is an inter-institutional application, the PMO has also informed the key users of NAP in the other EU institutions, bodies and agencies, which have all agreed on the modification. The PMO underlined that this modification will apply both to active staff and to pensioners of all EU institutions, bodies and agencies, as of May 2021.

Furthermore, the PMO stated that the salary/pension handlers will still be able to visualise the salary and pension slips for internal use, as otherwise it would complicate the controls that they are responsible for.

In light of the above positive outcome, we would like to thank you for bringing this important issue to our attention and for contributing to strengthening the data protection culture within the EU institutions. This was indeed an excellent opportunity for both the PMO and other services involved to carry out an in-depth investigation and, as accountable controllers of the data processing at hand, take all necessary steps to implement the principle of data protection by design and by default to improve the current procedure.

Following the above, we consider the issue solved and will close case 2019-1084.

Yours sincerely,

(e-signed)

Delphine HAROU

Annex: PMO's letter of 23 March 2021

Data Protection Notice

According to Articles 15 and 16 of Regulation (EU) 2018/1725 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, please be informed that your personal data will be processed by the EDPS, where proportionate and necessary, for the purpose of investigating your complaint. The legal basis for this processing operation is Article 57(1)(e) of Regulation (EU) 2018/1725. The data processed will have been submitted by you, or from other sources during the inquiry of your complaint, and this may include sensitive data. Your data will only be transferred to other EU institutions and bodies or to third parties when it is necessary to ensure the appropriate investigation or follow up of your complaint. Your data will be stored by the EDPS in electronic and paper files for up to ten years (five years for prima facie inadmissible complaints) after the case closure, unless legal proceedings require us to keep them for a longer period. You have the right to access your personal data held by the EDPS and to obtain the rectification thereof, if necessary. Any such request should be addressed to the EDPS at edps@edps.europa.eu. Your data might be transferred to other EU institutions and bodies or to any third parties only where necessary to ensure the appropriate handling of your request. You may also contact the data protection officer of the EDPS (EDPS-DPO@edps.europa.eu), if you have any remarks or complaints regarding the way we process your personal data. You can find the full version of our data protection notice on complaint handling at: [Complaints handling - Data Protection Notice | European Data Protection Supervisor \(europa.eu\)](#)



EUROPEAN COMMISSION

OFFICE FOR THE ADMINISTRATION AND PAYMENT OF INDIVIDUAL ENTITLEMENTS

Brussels,
PMO/HT - ARES(2021)

**NOTE FOR THE ATTENTION OF Ms D. HAROU
HEAD OF UNIT SUPERVISION AND ENFORCEMENT,
EDPS**

**Subject: Additional information related to Case 2019-1084 - Complaint
regarding information contained on monthly salary statements**

With your request of 10 February 2020 to follow up on Case 2019-1084, you asked the PMO to provide comments on the complaint regarding - inter alia- the inclusion of the full bank account number on the monthly salary slips. By note dated 26 August 2020, the PMO explained to you that the salary slips were designed in such a way that the bank account number appeared in full.

You had consequently informed us that the complainant was not convinced by the explanation given and you asked for some additional explanations.

On 15 December 2020, we informed you that following a further analysis made with our counterparts from DG HR and DG BUDG, we had come to the conclusion that there was no legal reason which would prevent us to stop indicating the full bank account number, and that we would investigate how the information on the salary slips could be adapted.

Following a technical investigation, it was proposed to adapt the display of the account number in the salary slips and only show the first two characters and the last four (instead of 6). This allows us to take into account the circumstance that in the pay application (NAP), there are also bank accounts with less than 9 characters, the majority of these being banks account from outside of EU.

The text is adapted as follow:

*Display on the salary/pension slips the first two characters and the last four and putting * in the remaining ones.*

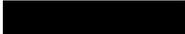
*For example: bank account BE 12 123 1234567 12 => BE ** *** *****67 12*

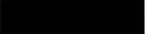
Since NAP is an inter-institutional application, the PMO informed the key users of NAP in the other Institutions. I am happy to inform you that they all agreed on this modification.

The modification will be applied to all salary/pension slips of all Institutions/Agencies as of May. It will apply both to active staff and to pensioners. It is not possible to apply the change retroactively.

The visualisation of the salary and pension slips for internal use by the salary/pension handlers will not be changed, as this would complicate the controls they are charged with.

Finally, please be assured that the PMO is taking its obligations pertaining to Regulation (EU)2018/1725 very seriously and we cannot do other than rejoice at the fact that this complaint helped us to reinforce the implementation of the privacy by design and privacy by default principles'. This also helps to create a "culture of continuous improvement" and make corrections before negative impacts can happen.


Data Protection Coordinator

c.c.: Mr , Data Protection Officer