

Data protection statement on the processing of personal data within the framework of Central Fee Payment Service (Patent fees)

Protecting your privacy is of the utmost importance to the European Patent Office (EPO). We are committed to protecting your personal data and ensuring respect for data subjects' rights when performing our tasks and providing our services. All data of a personal nature that identifies you directly or indirectly will be processed lawfully, fairly and with due care.

The processing operations described below are subject to the EPO Data Protection Rules ([DPR](#)).

The information in this statement is provided in accordance with Articles 16 and 17 DPR.

The Central Fee Payment service enables patent applicant, representatives and other parties to pay patent fees and order and pay patent information products

1. What is the nature and purpose of the processing operation?

This data protection statement relates to the processing of data provided in the Central Fee Payment Service (CFP).

Personal data is processed to enable the patent applicants, representatives and other parties to pay patent fees and claim refunds.

To use Central Fee Payment you need to register. You enter your contact details when you register using the [registration form](#) to create an EPO account using an email address and a password.

Once registered, [sign in](#) using two-factor authentication or by entering your email and password. Access rights when you use two-factor authentication are the same as those in MyEPO Portfolio and are managed in MyEPO Portfolio.

You can pay using your deposit account, bank account or credit card. If you wish to pay with your deposit account, the EPO account needs to be linked to your deposit account and have the necessary access rights (pay fees online, view fees online or plan fees online).

Once you have accessed the service, you can select the application and fees you would like to pay and add them to the shopping cart. At checkout, the fees are validated by the service. Afterwards, you can select the payment method: bank transfer, credit card or deposit account (deposit account only if signed in using two-factor authentication).

The processing is not intended to be used for any automated decision-making, including profiling.

Your personal data will not be transferred to recipients outside the EPO which are not covered by Article 8(1), (2) and (5) DPR unless an adequate level of protection is ensured. In the absence of an adequate level of protection, a transfer can only take place if appropriate safeguards have been put in place and enforceable data subject rights and effective legal remedies for data subjects are available, or if derogations for specific situations as per Article 10 DPR apply.

2. What personal data do we process?

The following categories of personal data of external individuals are processed:

- contact information: first name, surname, postal address, country, phone number, e-mail address
- financial information for payments: credit card number, deposit account number
- financial information for claiming a refund: bank account number, BIC/SWIFT number, deposit account number
- SAP logs
- cookie information
- account ID

3. Who is responsible for processing the data?

Personal data is processed under the responsibility of Principal Director PD 4.1 Finance acting as the EPO's delegated data controller.

Personal data is processed by the EPO staff in departments D412 Revenue Controls and D4613 Finance Tech Centre of Excellence involved in the handling of fee payments and refunds.

External contractors involved in providing the platform and maintenance services may also process personal data, which can include accessing it.

4. Who has access to your personal data and to whom are they disclosed?

Personal data is disclosed on a need-to-know basis to the EPO staff working in D412 Revenue Controls and D4613 Finance Tech Centre of Excellence units that will have access to the personal data concerned.

Personal data may be disclosed to third-party service providers for maintenance and support purposes.

Personal data will only be shared with authorised persons responsible for the necessary processing operations. It will not be used for any other purposes or disclosed to any other recipients.

5. How do we protect and safeguard your personal data?

We take appropriate technical and organisational measures to safeguard and protect your personal data from accidental or unlawful destruction, loss or alteration and unauthorised disclosure or access.

All personal data is stored in secure IT applications in accordance with the EPO's security standards. Appropriate levels of access are granted individually only to the above-mentioned recipients.

For systems managed on EPO premises, the following basic security measures generally apply:

- User authentication and access control (e.g. role-based access control to the systems and network, principles of need-to-know and least privilege)
- Logical security hardening of systems, equipment and network

- Physical protection: EPO access controls, additional access controls to datacentre, policies on locking offices
- Transmission and input controls (e.g. audit logging, systems and network monitoring)
- Security incident response: 24/7 monitoring for incidents, on-call security expert.

For personal data processed on systems not hosted on EPO premises, the providers processing the personal data have committed in a binding agreement to comply with their data protection obligations under the applicable data protection legal frameworks. The EPO has also carried out a privacy and security risk assessment. These systems are required to have implemented appropriate technical and organisational measures such as: physical security measures, access and storage control measures, securing data at rest (e.g. by encryption); user, transmission and input control measures (e.g. network firewalls, network intrusion detection system (IDS), network intrusion protection system (IPS), audit logging); conveyance control measures (e.g. securing data in transit by encryption)')

6. How can you access, rectify and receive your data, request that your data be erased, or restrict/object to processing? Can your rights be restricted?

You have the right to access, rectify and receive your personal data, not to be subject to a decision based solely on automated processing, to have your data erased and to restrict and/or object to the processing of your data (Articles 18 to 24 DPR).

If you would like to exercise any of these rights, please write to the delegated data controller at PDFinance-DPL@epo.org. In order to enable us to respond more promptly and precisely, you always need to provide certain preliminary information with your request. We therefore encourage you to fill in this [form](#) and submit it with your request.

We will reply to your request without undue delay and in any event within one month of receipt of the request. However, Article 15(2) DPR provides that this period may be extended by two further months where necessary in view of the complexity and number of requests received. We will inform you of any such delay.

7. What is the legal basis for processing your data?

Personal data is processed on the basis of Article 5 DPR (a) and (b):

- processing is necessary for the performance of a task carried out in the exercise of the official activities of the European Patent Organisation or in the legitimate exercise of the official authority vested in the controller, which includes the processing necessary for the Office's management and functioning, and
- processing is necessary for compliance with legal obligation to which the controller is subject.

Personal data is processed on the basis of the following legal instrument:

[Article 6](#) of the Rules Relating to Fees - Particulars concerning payments
[Article 51](#) of European Patent Convention – Fees

8. How long do we keep your data?

Personal data will be kept only for the time needed to achieve the purposes for which it is processed.

Personal data that is no longer needed will be deleted after 10 years.

In the event of a formal appeal/litigation, all data held at the time the formal appeal/litigation was initiated will be retained until the proceedings have been closed.

9. Contact information

If you have any questions about the processing of your personal data, please write to the delegated data controller at PDFinance-DPL@epo.org.

You can also contact our Data Protection Officer at dpo@epo.org.

Review and legal redress

If you consider that the processing infringes your rights as a data subject, you have the right to request review by the controller under Article 49 DPR and, if you disagree with the outcome of the review, the right to seek legal redress under Article 50 DPR.