

RECORD OF PROCESSING ACTIVITY

European Commission learning platform access administration

1. Controller(s) of data processing activities

Controller: European Central Bank

Organisational unit responsible for the processing activity: European Central Bank (ECB)/Talent Management Division

Data Protection Officer (DPO): DPO@ecb.europa.eu

2. Who is actually conducting the processing activity?

The data is processed by the ECB itself

The organisational unit conducting the processing activity is:

The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party:

European Commission

3. Purpose of the processing

The data is required by the European Commission to create EU login accounts for eligible ECB staff. Having an EU Login account is a requirement for having access to the European Commission's learning portal "EU Learn" for which DGHR has purchased licences for all staff. EU Learn is a learning portal which provides users access to training made available by the EC as well to LinkedIn Learning content.

4. Description of the categories of data subjects

Whose personal data are being processed?

- ECB staff
- Externals (agency staff, consultants, trainees or secondees)
- NCB or NCA counterparts (in the ESCB or SSM context)
- Visitors to the ECB, including conference participants and speakers
- Contractors providing goods or services
- Complainants, correspondents and enquirers
- Relatives of the data subject
- Other (please specify):

5. Description of the categories of personal data processed

(a) General personal data:

The personal data contains:

- Personal details (name, address etc)
- Education & Training details
- Employment details
- Financial details
- Family, lifestyle and social circumstances
- Goods or services provided
- Other (please give details): a PER ID which is a unique ID generated by the European Commission's RETO (Reservation Tool) database. Each user having an EU Login account must be registered in this tool with a valid PER ID.

(b) Special categories of personal data

The personal data reveals:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data, biometric data for the purpose of uniquely identifying a natural person or data concerning health
- Data regarding a natural person's sex life or sexual orientation

6. The categories of recipients to whom the personal data have been or will be disclosed, including the recipients of the data in Member States, third countries or international organisations

- Data subjects themselves
- Managers of data subjects
- Designated ECB staff members
- Designated NCB or NCA staff members in the ESCB or SSM context
- Other (please specify): European Commission IT staff who are responsible for the administration of the COMFREF portal for the ECB.

7. Transfers to/Access from third countries or an international organisation

Data are processed by third country entities:

- Yes

Specify to which countries:

The European Commission doesn't transfer data outside the EU. However, LinkedIn Learning Ireland uses LinkedIn Corporation based in the US as a sub-processor. As a result, the pseudonym that is transferred to LinkedIn Learning Ireland can be disclosed to LinkedIn Corporation based in the US.

Specify under which safeguards:

- Adequacy Decision of the European Commission
- Standard Contractual Clauses
- Binding Corporate Rules
- Administrative arrangement containing enforceable and effective data subject rights

If the third country's legislation and/or practices impinge on the effectiveness of appropriate safeguards, the personal data can only be transferred to, accessed from or processed in such third country when sufficient 'supplementary measures' are taken to ensure an essentially equivalent level of protection to that guaranteed within the EEA. These supplementary measures are implemented on a case-by case basis and may be technical (such as encryption), organisational and/or contractual.

No

8. Retention time

The list of ECB staff and non-staff members entitled to access European Commission Learning Platform (Master Excel file maintained by HR/TMA) is maintained up to date. Personal data of users who leave the ECB are deleted from the list on a regular basis (every six months). To learn more about how the European Commission treats the personal data of users from EU Institutions users please refer to:

1. **EC Identity & Access Management Service (IAMS)** – Record of processing

activities: <https://ec.europa.eu/dpo-register/detail/DPR-EC-03187.1>

EC Learning Management System “EU Learn” – Record of processing activities

<https://ec.europa.eu/dpo-register/detail/DPR-EC-00967.4>