

15/03/2023

ECB-PUBLIC  
UPDATABLE

## RECORD OF PROCESSING ACTIVITY

### Authorisation of external activities

#### 1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Contact details:

*European Central Bank*

*Sonnemannstrasse 22*

*60314 Frankfurt am Main*

*Germany*

*E-mail: [info@ecb.europa.eu](mailto:info@ecb.europa.eu)*

Organisational unit responsible for the processing activity:

Directorate General Human Resources (DG-HR)

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

DG-HR and DG-HR senior management

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

Link to privacy statement if available

### 3. Purpose of the processing

The ECB processes personal data when a member of staff asks the Director General HR or their deputy to provide them with prior authorisation to engage in an external activity that is of an occupational nature or goes otherwise beyond what can be reasonably considered a leisure activity.

The purpose of processing is to assess, examine and reply to requests for external activities. In doing so, DG-HR and the Director General HR verify, also consulting the Compliance and Governance Office, whether the external activity does not in any way impair the performance of the member of staff's professional duties towards the ECB and does not constitute a likely source of conflict of interest.

Where a staff member is in receipt of disability allowance, additional steps are required to assess if there is an impact on that allowance in line with Article 2(ii) of Annex IV to the Conditions of Employment (Disability Annex).

When a member of staff notifies the Director General Human Resources or their Deputy of their intention to stand for or them being elected or appointed to public office, personal data are processed in order to decide whether the member of staff concerned:

- (a) should be required to apply for unpaid leave on personal grounds;
- (b) should be required to apply for annual leave;
- (c) may be authorised to discharge their professional duties on a part-time basis;
- (d) may continue to discharge their professional duties as before.

### 4. Description of the categories of data subjects

*Whose personal data are being processed?*

- ECB staff
- Externals subject to the ECB ethics framework (trainees)
- 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):

### (b) Special categories of personal data

The personal data reveals:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership

<input type="checkbox"/> Genetic data, biometric data for the purpose of uniquely identifying a natural person or data concerning health <input type="checkbox"/> Data regarding a natural person's sex life or sexual orientation
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**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**

<input checked="" type="checkbox"/> Data subjects themselves  <input checked="" type="checkbox"/> Managers of data subjects if there is a potential conflict of interest. . In most cases colleagues are asked to inform managers of external activities themselves.  <input checked="" type="checkbox"/> Designated ECB staff members  <input type="checkbox"/> Designated NCB or NCA staff members in the ESCB or SSM context  <input checked="" type="checkbox"/> Other (please specify): <ul style="list-style-type: none"> <li>- The staff member who submits the request for external activity on behalf of the data subject (in case not directly submitted by the staff member him/herself).</li> <li>- In cases where the staff member is in receipt of disability allowance: The ECB Medical Centre, ECB Medical Adviser.</li> </ul>
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**7. Transfers to third countries or an international organisation**

<p>Data are transferred to third country recipients:</p> <input type="checkbox"/> Yes  <input type="checkbox"/> Adequacy Decision of the European Commission <input type="checkbox"/> Standard Contractual Clauses <input type="checkbox"/> Binding Corporate Rules
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Memorandum of Understanding between public authorities

No

## 8. Retention time

Personal data will be stored for a maximum of 5 year from the date of termination of the activity before being deleted, in accordance with series 3.7.1.5 of the ECB-wide retention plan.

External activity approvals are stored in the personal file and retained for a maximum of 10 years after the end of employment with the ECB or following the last ECB pension payment to either the staff member as a pensioner or the entitled dependants, in line with series 3.7.1.1 of the ECB Retention Plan.