

24/02/2020 (DATE OF PUBLICATION/LAST UPDATE)

ECB-PUBLIC  
UPDATABLE

## RECORD OF PROCESSING ACTIVITY

Activities related to internal appeals

### 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) and Directorate General Legal Services (DG-L)

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 are, depending on the level of the appeal (administrative review, grievance or special appeal, appeals to the President):
- DG-HR pre-litigation team and DG-HR senior management office,  
Civil Service Law Team of the Institutional Law Division (DG-L/ILA),  
President of the ECB and Office of the President, Executive Board

### 3. Purpose of the processing

To perform activities related to pre-litigation on human resources related matters, i.e. internal appeals (administrative reviews, grievances, special appeals, appeals to the President) and objections.

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

- ECB employee(s)
- Externals (agency staff, consultants, trainees or secondees)
- Relatives of the data subject
- Other:
  - Former members of staff
  - Non-ECB staff claiming requalification of the employment status
  - Non-ECB applicants in recruitment
  - Dependents of deceased staff members insofar as they may be eligible to benefits or entitlements

### 5. Description of the categories of personal data processed

#### General personal data:

Depending on the subject matter of the appeal, the personal data may contain:

- Personal details (name, address etc)
- Education & Training details
- Employment details
- Financial details
- Family, lifestyle and social circumstances
- Goods or services provided

**Special categories of personal data:**

Depending on the subject matter of the appeal, sensitive personal data may be revealed:

- 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 or recipients to whom the personal data have been or will be disclosed, including the recipient(s) of the data in Member States, third countries or international organisations**

- Data subjects themselves
- Designated ECB staff members involved in drawing up the response
- Other: *Depending on the subject matter of the appeal, the following persons/units may have access to the personal data:*
  - *DG-HR senior management*
  - *Executive Board, including the President*
  - *ECB Chief Services Officer*
  - *Designated staff members who need, for professional reasons, to have access to the information contained in the file. In particular, staff from the following business areas/units:*
    - o *Designated subject matter experts in DG-HR*
    - o *HR operations team in DG-HR/Employee Services Division, who are responsible for storing the documentation in the personal file of the staff member, in accordance with Article 8.5.23 of the Staff*

*Rules*

- *Secretariat Division/ Directorate General Secretariat*
- *Compliance and Governance Office/Directorate General Secretariat*
- *Legislation Division/ Directorate General Legal Services (if translations are needed)*
- *ECB Data Protection Officer and team*
  - *Manager(s) of the data subjects*
  - *Designated NCB or NCA staff members in the ESCB or SSM context*
  - *ECB medical adviser*
  - *Witnesses*
  - *Persons assisting or representing the staff member*
  - *External experts, including lawyers, consulted to assist the ECB*
  - *European Courts*
  - *European Ombudsman*
  - *National authorities and/or Courts*

**7. Retention time**

Case files on appeals are kept for 10 years from the date the case is closed.