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ECB-PUBLIC
UPDATABLE

RECORD OF PROCESSING ACTIVITY

Activities related to the Dignity at work procedure

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

Organisational unit responsible for the processing activity: Directorate General Human Resources (DG-HR)

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:

Directorate General Human Resources (DG-HR)

3. Purpose of the processing

The processing is necessary to ensure that dignity at work is respected in accordance with Article 0.5 of the Ethics Framework. The Ethics Framework foresees an informal and formal procedure to deal with dignity at work issues. These procedures have been

established to address situations where an individual considers themselves to be target of inappropriate behaviour by their colleagues.

4. Description of the categories of data subjects

- ECB staff or former staff
 - Non-ECB staff subject to the Ethics Framework
- Depending on the subject matter of the case, the personal data of the following may be processed:*
- Non-ECB staff (agency staff, consultants, cost-free trainees or cost-free secondees working at the ECB)
 - NCB or NCA counterparts (in the ESCB or SSM context)
 - Visitors to the ECB
 - Contractors providing goods or service
 - Complainants, correspondents and enquirers
 - Relatives of the data subject
 - Other: *witnesses or other persons involved in the procedure (who may come within the categories above)*

5. Description of the categories of personal data processed

- General personal data:**
- Personal details (name, address etc)
- Depending on the subject matter of the case, the personal data may contain:*
- Education & Training details
 - Employment details

- Family, lifestyle and social circumstances

Special categories of personal data

Depending on the subject matter of the procedure, 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 the dignity at work procedure

Depending on the specific case, the following persons/units may have access to the personal data:

- *Executive Board, including the President*
- *ECB Chief Services Officer*
- *Witnesses*
- *Managers of the data subjects*
- *Persons accused of wrongdoing*
- *Persons assisting or representing the staff member*
- *Designated persons in DG-HR involved in the case*
- *Social counsellors (at the request of the staff member, see prior checking [case 2007-489](#))*

- *ECB medical adviser*
- *If a formal procedure results in an administrative inquiry (see prior checking case [2005-290](#)) or disciplinary procedure (see prior checking case [2004-270](#)), the data may be shared with stakeholders in these procedures*
- *Secretariat Division or Compliance and Governance Office / Directorate General Secretariat*
- *Directorate Internal Audit*
- *Directorate General Legal Services*
- *Division Security and Safety/ Directorate General Administration*
- *ECB Data Protection Officer and team*
- *External experts, including lawyers, consulted to assist the ECB*
- *European Courts*
- *European Ombudsman*
- *National authorities and/or Courts*

7. Retention time

Case files are kept for 2 years from the date the case is closed.