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## RECORD OF PROCESSING ACTIVITY

### Farewell Process and Exit Interviews

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

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity:

Directorate General Human Resources (DG-HR) / Business Partnering Division

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

#### 2. Who is actually conducting the processing activity?

☒ The data are processed by the ECB itself

The organisational unit conducting the processing activity is:

DG-HR / Business Partnering Division – Employee Partner team

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

#### 3. Purpose of the processing

The data are collected and analysed with the purpose of improving the organisational environment and culture and addressing issues in the organisation that are otherwise hidden and not shared with DG-HR.

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

*Whose personal data are being processed?*

- ☒ ECB staff
- ☒ Externals (agency staff, consultants, trainees or secondees)
- ☐ National central bank (NCB) or national competent authority (NCA) counterparts (in the European System of Central Banks (ESCB) or Single Supervisory Mechanism (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 contain:

- ☒ Personal details (name, address, etc.)
- ☐ Education and training details
- ☒ Employment details
- ☐ Financial details
- ☐ Family, lifestyle and social circumstances
- ☐ Goods or services provided

- ☒ Other (please give details): departing ECB employees provide feedback and personal opinions, experiences and impressions from their time at the ECB.

**(b) Special categories of personal data**

The personal data reveal:

- ☐ 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):

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

Data are processed by third country entities:

☐ Yes

Specify to which countries:

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 European Economic Area. 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 aggregated data resulting from the survey will be kept for a period of ten years from the moment they are finalised. The qualitative data including free text feedback and notes from the discussions with staff will be kept for less time, namely for one year from the moment they are finalised. Both data categories will be destroyed once these periods have passed, as part of the annual data destruction exercise.