

RECORD OF PROCESSING ACTIVITY

Implementation of the ECB Ethics Framework

(Pursuant to Chapter 0 of the Staff Rules, Ethics Framework)

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 Secretariat, Division Compliance and Governance

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 Secretariat, Division Compliance and Governance
- The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party (Ernst & Young)
Link to privacy statement: https://www.ey.com/en_gl/privacy-statement

3. Purpose of the processing

Personal data are collected in the context of (i) providing ethical advice on rules for which the CGO is entrusted under the ECB ethics framework such as conflicts of interest, gifts and hospitality, private financial transactions, post-employment restrictions, external activities, etc. and (ii) monitoring compliance of private financial transactions (Chapter 0 of the ECB Staff Rules).

4. Description of the categories of data subjects

- ECB employee(s)
- Externals (agency staff, consultants, trainees or secondees)
- Visitors to the ECB, including conference participants and speakers
- Contractors providing goods or services
- Relatives of the data subject

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
- 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): External Service Provider (monitoring of compliance of private financial transactions)

7. Transfers to third countries or an international organisation

Data are transferred to third country recipients:

- Yes
- Adequacy Decision of the European Commission
 - Standard Contractual Clauses
 - Binding Corporate Rules
 - Memorandum of Understanding between public authorities
- No

8. Retention time

- Personal data processed in relation to advice provided to staff on the ECB ethics framework are kept for five years.
- Information about employees' bank accounts is stored for one year after the end of employment contract. Data on closed bank accounts is deleted one year after account closure.
- Personal data processed for the purpose of monitoring compliance of private financial transactions, is deleted upon finalisation of a given monitoring exercise.
- Personal data related to suspected breaches of the ECB ethics framework are saved for five years.
- Personal data on breaches leading to disciplinary actions is stored for 10 years.
- Ernst & Young, the External Service Provider keeps the final reports on compliance of private financial transactions for 10 years, in line with §51b of the German auditors act (Wirtschaftsprüferordnung).