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ECB-PUBLIC
UPDATABLE

RECORD OF PROCESSING ACTIVITY

Processing of personal data in the frame of deductions from salary in the event of a strike

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: organisational unit:
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: DG-HR

3. Purpose of the processing

According to Article 1.4 of the ECB Staff Rules, staff members at the ECB have a right to strike. Article 1.4.5 provides that "*unless the Executive Board decides otherwise, the total period of the strike shall be deducted from the salary related payments of the member of staff taking part in the strike*". Furthermore, "*no disciplinary action may be taken against any member of staff*".

participating in a strike unless the member of staff has been nominated to provide the minimum services described above and fails to do so in order to take part in the strike" (Article 1.4.7). The same rule applies as concerns salary deductions for short term employment on the basis of Article 1.4.5 of the Rules for Short Term Employment. On this basis, at its meeting of 26 May 2009, the Executive Board confirmed that following a strike action on 3 June 2009, there would be an equivalent recalculation of salary and salary related payments and deductions (i.e. allowances and deductions calculated on basis of salary).

To be able to deduct from the salary/salary related items, the names of the staff members taking part in the strike and the period of time absent due to the strike are registered in ISIS as "unpaid leave for other reasons" which is used for other purposes as well. The fact that the staff member participated in the strike action will also be made visible in a separate page of the payslip of the person concerned to justify the reduction of salary and related elements.

4. Description of the categories of data subjects

ECB employee(s)

5. Description of the categories of personal data processed

(a) **General personal data:**
 The personal data contains:

- Personal details (name, address etc)
- Employment details
- Financial details

(b) **Special categories of personal data**
 The personal data reveals:

- Trade union membership

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

Designated ECB staff members

7. Retention time

All payroll data, including deductions for participation in a strike action, will be kept in the ISIS system up to 5 years after data subject has left the ECB (if data subject has no pension rights) or up to 10 years after the last payment to a dependant was made (if the data subject has a right to a differed pension).