

20/02/2025 (DATE OF PUBLICATION/LAST UPDATE)

UPDATABLE

RECORD OF PROCESSING ACTIVITY

Maintenance of the Digital Personal File

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity:

Directorate General Human Resources / Employee Services division (DG-HR / ESE)

Contact person¹: dghr-ese-secretariat@ecb.europa.eu

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 units conducting the processing activity are:

Directorate General Human Resources (DG-HR)

Directorate Internal Audit (D/A, Security Service Centre)

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

Link to privacy statement if available

¹ Please provide the name of the contact person and a functional email account of the competent unit.

3. Purpose of the processing

The digital file will provide DG-HR staff access to all HR-related documents in an electronic personnel file with the aim of improving the efficiency of the processes where working with paper documents can be reduced to a minimum (documents submitted on paper are scanned by the HR Operations Administrators via centralised Xerox scanners and uploaded to the personnel file). The Security Service Centre in D/A needs to process the data in order to manage the badges and access rights to buildings.

4. Description of the categories of data subjects

Whose personal data are being processed?

- ECB staff
- Externals (agency staff, consultants, trainees or secondees)
- NCB or NCA counterparts (in the ESCB or 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): legal heirs, power of attorney authorised persons who are not related to 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): personnel files can include the following type of information: compensation data, working time and leave, career development and training, accident or disability procedures, professional activity outside the ECB, internal or external appeals, pension data

(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 (and trainees)
- 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 EEA. 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

Refer to Class 3 of the [ECB's Filing and Retention Plan](#)