



21/03/2025

RECORD OF PROCESSING ACTIVITY

NAME OF PROCESSING ACTIVITY:

HR Service Management (via myHR)

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: 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
- The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party [Staff Info Point].

3. Purpose of the processing

As also stated in the privacy statement for myHR, personal data are processed for ensuring access to HR services, arising from the (usually) contractual obligation towards the data subjects as well as from the statutory tasks of the ECB.

The processing of personal data is conducted for the following purposes:

- Providing customers (i.e. data subjects) an easy-to-access possibility to contact HR and to get answers concerning any HR service.
- Providing the possibility for structured service requests to customers (i.e. data subjects) and enabling the corresponding workflows by providing information that is both necessary and relevant to process each request. This includes:
 - requesting allowances (related to appointment or termination, education allowance, study support reimbursement)
 - requesting insurances continuation (by leavers who would like to extend their insurance coverage to after their employment)
 - requesting special leave quota for birth / adoption
 - requesting study support
 - requesting admin reviews
- Coordinating and keeping track of signing letters to staff members
- Delivering official letters / contracts to the customer (i.e. data subject) and offer the possibility to upload countersigned letters
- Requesting meeting appointments with:
 - Staff Info Point
 - Employee Partners
 - HR Business Partners

Providing the possibility to submit documentation that supports the assessment and confirmation of eligibility to specific benefits/allowances (in addition to those covered above), or the employee's obligation to inform the ECB in case of changes to their personal situation (e.g. change of residence, partner's tax declaration, etc.).

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): ECB pensioners, former ECB staff for up to one year after leaving, future ECB staff (recently hired, before their starting date)

5. Description of the categories of personal data processed

(a) General personal data:

The personal data contains:

- Personal details (name, address, contact details, etc.)
- Education & Training details
- Employment details (org. unit, job title, employee group/subgroup, contract type, etc.)
- Financial details
- Family, lifestyle and social circumstances
- Goods or services provided
- Other (please give details): Personal data deemed by the data subject as relevant for the processing of inquiries raised by them about any HR service (e.g. to establish eligibility, process benefits, ensure compliance with the relevant legal framework). This may include sensitive personal data, especially with regard to HR services related to sick leave administration, full or partial disability, double child allowance or birth of a child. Request forms and documentation needed for the allowances (such as allowances related to appointment or termination, education allowance, study support reimbursement, household allowance), request forms for insurance continuation, or requests for study support; requests for HR appointments (name, organisational unit, employee group/sub-group, contract type). The precise content of the inquiry is controlled by the data subject. Meta-data about letters to staff members to be signed

(letter title, timestamp, approver, operator). Requests for admin reviews, supporting evidence and the outcomes. Sick leave or disability (administrative data only, e.g. start/end date). Compensation 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: *sick leave administration*
- 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 (*HR team members based on subject matter expertise*)
- Managers of data subjects (only for established workflows like the approval of study support)
- Designated ECB staff members
- Designated NCB or NCA staff members in the ESCB or SSM context
- Other (please specify): *Staff Info Point team members (currently external contractors) or ECB Trainees, wherever relevant based on the inquiry/request and subject matter expertise.*

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 [ECB's Filing and Retention Plan](#)

Maximum one year following the last time an inquiry was closed (in the scenario where a ticket was re-opened). This is in line with various class codes in the ECB's Filing and Retention Plan, e.g. class code 3.8.5.3 on Staff requests.