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ECB-PUBLIC  
UPDATABLE

**RECORD OF PROCESSING ACTIVITY:**  
Training administration via external providers

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

Controller: European Central Bank (ECB)

Organisational unit responsible<sup>1</sup> for the processing activity: DG-HR/TMA

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

**3. Purpose of the processing**

The data is required by PWC to enable them to organise & administer the trainings that they offer to the ECB e.g. the email addresses are required to send the WebEx link to the training.

<sup>1</sup> This is the unit that decides that the processing takes place and why.

**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):

**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): PWC training administrators and PWC trainers (either PWC employees or subcontractors)

**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**

The data that we share with PWC is stored in SAP in line with the ECB retention plan. The attendance lists that will be produced by PWC using this data and provided to the ECB at the end of every training, shall be kept for 5 years in line with the ECB retention plan. PWC will retain the Attendance lists for a maximum of one year.