



29 JULY 2021 (DATE OF PUBLICATION/LAST UPDATE)

ECB-PUBLIC

UPDATABLE

RECORD OF PROCESSING ACTIVITY

Processing of names and mail addresses in the context of the IT Responsible Disclosure Programme

1. Controller(s) of data processing activities

Controller: European Central Bank

Organisational unit responsible for the processing activity: DG-IS/DSS

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-IS/DSS
- 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

With the IT Responsible Disclosure Programme, IT security researchers can report IT security vulnerabilities that affect ECB managed systems as described under the programme. When IT security researchers submit their information via email, we may receive their names and the corresponding email addresses.

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): IT Security researchers who contact ECB when they discover IT security vulnerabilities that affect ECB managed systems as described under the IT Responsible Disclosure webpage.

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):

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

1 year