



RECORD OF PROCESSING ACTIVITY

TARGET2-Securities (T2S)

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB) and the other Joint Controllers (Eurosystem Central Banks, the non-euro area National Central Banks and Signatory Central Securities Depositories participating in T2S)

Organisational unit responsible for the processing activity: Directorate General Market Infrastructure and Payments (DG/MIP) within the ECB

Contact point: DPO@ecb.europa.eu; MIP-Compliance@ecb.europa.eu

2. Who is actually conducting the processing activity?

- The data is processed by the ECB, DG/MIP, as part of the joint controllers, which are Eurosystem Central Banks, the non-euro area National Central Banks and signatory Central Securities Depositories participating in T2S.
- 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
- Personal data are also processed by a group of four central banks, controller with
- specific operational responsibilities of T2S (Banque de France, Deutsche Bundesbank, Banca d'Italia and Banco de España).

3. Purpose of the processing

T2S processes (as defined in the EUDPR/GDPR) personal data for the following purposes:

- to authenticate and to validate T2S user's identity and to control access to the T2S Graphical User Interface (GUI). For this purpose, personal data of natural persons, i.e. T2S System Users are processed in T2S;
- the ECB may facilitate payment instructions on behalf of a T2S participant if this participant faces problems in performing the payment instruction themselves and instructs the ECB to act on its behalf, as agreed and authorised in the relevant contract between the T2S participant and the ECB; and
- for storage in the legal archive.

Per se, the settlement of T2S securities does not require the usage of personal data.

Additionally, although it is not a standard market practice, it cannot be excluded or prevented that other personal data may also be included in a free format field of the transaction message.

Personal data are not required to settle securities instructions in T2S, therefore any personal data present in a securities instruction is merely passed through. In line with the EUDPR/GDPR, this implies that T2S processes any personal data present in the securities instruction.

If duly authorised authorities, e.g. duly authorised legal enforcement authorities, raise a legitimate access request for T2S data, the access to the requested data may include access to personal data if it is present in the requested securities instruction.

4. Description of the categories of data subjects

Whose personal data are being processed?

ECB staff

- Externals (agency staff, consultants, trainees or secondees)
- NCB
- 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): T2S participants; natural persons, as appropriate, when these are the sending or receiving customer; and other natural persons whose personal data may be included in a free format field of the transaction message.

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): Any personal data can be included in a free format field as a part of the transaction message, although this is not common business practice.

(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 staff members
- Other (please specify): T2S participants

7. Transfers to/Access from third countries or an international organisation

Data are processed by third country entities:

<p><input type="checkbox"/> Yes</p> <p>Specify to which countries:</p> <p>Specify under which safeguards:</p> <p><input type="checkbox"/> Adequacy Decision of the European Commission</p> <p><input type="checkbox"/> Standard Contractual Clauses</p> <p><input type="checkbox"/> Binding Corporate Rules</p> <p><input type="checkbox"/> Administrative arrangement containing enforceable and effective data subject rights</p> <p><input checked="" type="checkbox"/> No, personal data are not processed (e.g., transferred, accessed, or stored) in third countries or international organisations.</p>
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8. Retention time

Personal data are stored within T2S for a maximum duration of ten years for legal evidence and fiscal purposes, as required by relevant national laws and regulations.