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ECB-PUBLIC

UPDATABLE

RECORD OF PROCESSING ACTIVITY

ECB Data Portal (EDP)

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB

Organisational unit responsible for the processing activity:

Directorate General Statistics / Statistical Applications and Tools (SAT);

Directorate Information Systems / Data Analytics Domain Services (DAS)

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-Statistics / Statistical Applications and Tools Division

DG-Information Systems / Data Analytics Domain Services Division

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

- ECB Managed Services Partners1 (https://www.ibm.com/privacy/portal/us-en;

dpocapgemini.global@capgemini.com ; privacy@dxc.com)

- Matomo Cloud (and its subprocessors²)

¹ At the time of writing, IBM Germany is the incumbent ECB Data MSP. As of 1 July 2023, two MSPs (Managed Service Provider) will be in charge of EDP (Electronic Data Processing) support and maintenance: Capgemini Deutschland GmbH and DXC Technology Deutschland GmbH.

² Please find here full list of Matomo subprocessors: <u>https://matomo.org/matomo-cloud-privacy-policy/</u>

3. Purpose of the processing

Information recorded by the EDP's servers

The recipients of the personal data will mainly be the ECB Data Portal administrators and staff of Directorate General Statistics. Apart from a restricted group of ECB staff, external agencies may also process data on behalf and under the authority of the ECB.

Log information – servers automatically record information that your browser sends whenever you visit the ECB Data Portal. These server logs may include information such as the date and time of your visit, your Internet Protocol address, the domain name, the type of browser and operating system used (if provided by the browser), the URL of the referring page (if provided by the browser), the object requested and the completion status of the request. The information the ECB Data Portal collects is only used to compile statistics, on an aggregated basis, on the usage of this site. None of this information is reviewed at an individual level, nor associated with any other personal information.

Besides server logging, ECB's Datadog platform is used as a central monitoring and observability platform for application and infrastructure logs.

Log-in - registration on ECB Data websites is optional. If you choose not to register or actively provide personal information, you can still use the ECB Data Portal websites.

If you decide to register on the ECB Statistical Data Portal, you will be requested to enter your email address and password. Optionally you may share the context in which you plan to use the portal, e.g. Business professional, Economic enthusiast, Journalist, Student, etc.

More information such as e-mail, encrypted password or the usage context is collected and stored through ECB Data Portal login for advanced features. The log-in functionality allows you creating and managing your own personalised lists, such as favourite data lists, publications, articles, notifications or set-up a personalised dashboard. The ECB Data Portal news and data release notification subscriptions will be retained in case you subscribe to these services.

Cookies - cookies are small bits of data sent by a website server to the browser on your computer. The browser tells the server when you next visit that particular website. Cookies help storing the user preferences, such as data comparison selections, searched items related information, preferences on displaying information.

Usage Statistics - Matomo, a Europe-based external contracted service, is used to obtain statistics about the usage of the website, for example aggregate statistics about the number and duration of visits, usage patterns, traffic sources, geographic location, portal language and

searches/downloads performed on this website. Additionally, the service may also be used to test how to improve user experience on our website.

Data collection tracks the number of visitors to the various parts of the site, manage visitor traffic and improve functionality and usability. We do not identify individual visitors and we receive anonymised aggregate data. The following personal data may be collected, subject to user consent: online identifiers, including cookie identifiers, device identifiers; client identifiers, with and envisaged 14-month retention period. Refer to <u>Matomo Cloud's privacy</u> policy available on the company's website.

Information recorded by third party servers

Please note that the ECB Data Portal is not responsible for the privacy policies or content on third-party websites. You are therefore encouraged to review their privacy policies, when visiting these websites. Certain third-party features on our website require cookies. For example, a video player or social media content embedded in a page may set cookies. These features will be disabled if you do not accept the use of cookies.

4. Description of the categories of data subjects				
Whose	e personal data are being processed?			
\square	ECB staff			
\square	Externals (agency staff, consultants, trainees or secondees)			
\square	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): users of the ECB Data Portal from all around the world, including internal ECB/ESCB users and external users, also from International Organisations			

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
- \bigcirc Other (please give details):

The **server logs** may include information such as the date and time of visit, Internet Protocol address, the domain name, the type of browser and operating system used (if provided by the browser), the URL of the referring page (if provided by the browser), the object requested and the completion status of the request. Server logs are shipped to ECB's Datadog platform.

The **logged-in** users' email addresses, encrypted passwords or optionally the usage context (e.g. Business professional, Economic enthusiast, Journalist, Student) are collected and stored through ECB Datal. In addition, information on last login, personalised lists (e.g. data lists, publications, articles, notifications), personalised dashboard and subscription preferences to news and newsletters are collected.

Via the **Usage Statistics** service online user identifiers, including cookie identifiers, device identifiers, client identifiers, usage patterns, traffic sources, geographic location, language versions of browsing are collected. The ECB also by default enables IP anonymisation for usage statistics collected via Matomo.

(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	
\boxtimes	Designated ECB staff members	
	Designated NCB or NCA staff members in the ESCB or SSM context	
\boxtimes	Other (please specify):	
	- ECB Managed Services Partners ³	
	- ECB Cloud Services Partner ⁴	

7. Transfers to third countries or an international organisation

Data are transferred to third country recipients:

Yes

Adequacy Decision of the European Commission

³ At the time of writing, IBM Germany is the incumbent ECB Data MSP. As of 1 July 2023, two MSPs will be in charge of EDP support and maintenance: Capgemini Deutschland GmbH and DXC Technology Deutschland GmbH.

⁴ Amazon Web Services EMEA SARL

		Standard Contractual Clauses
		Binding Corporate Rules
		Memorandum of Understanding between public authorities
\square	No	

8. Retention time

Server logs are shipped to ECB's Datadog platform. Logs in Datadog are retained in their "main" index for **15 days** (at the time of writing this, retention period is planned to be reduced to 7 days). General data retention periods are described here: https://docs.datadoghq.com/developers/guide/data-collection-resolution-retention/

The **log-in account** for a minimum period of **2 years**, depending upon the user activity. Following two years of inactivity, the ECB Data Portal account, associated lists and subscription preferences will be removed.

Every 6 months all first-party cookies are removed and you are asked to make your selection again, to ensure your preferences are still valid and up-to-date.

Matomo (web analytics) has a 24-month and 14-days retention period for usage statistics data.