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ECB-PUBLIC  
UPDATABLE

## RECORD OF PROCESSING ACTIVITY

Training of administration via external providers

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

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity:

European Central Bank (ECB) / 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:

DG Human Resources – Talent Management Division

The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party [Rotterdam School of Management (RMS)]

Contact point at external third party (e.g., Privacy/Data Protection Officer):

Rianne van Reeuwijk ([rreeuwijk@rsm.nl](mailto:rreeuwijk@rsm.nl))

### 3. Purpose of the processing

The data is required to organise and administer the trainings offered by RSM, including the nomination process and the tracking of participation.

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

## 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

The data shared with RSM via email is stored in DARWIN for 10 years in line with the ECB Retention Plan (series 03.01.01.01). RSM will retain the attendance lists until the end of the contract, at the latest.