



## RECORD OF PROCESSING ACTIVITY MEDUSA

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

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity:

European Central Bank DG-IS/PRS, DG-OMI/IMI

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-OMI/IMI & DG-IS/PRS/STD

Processing conducted on the ECB AWS and Azure cloud landing zones owned by DG-IS/IOS as well as the DISC/DEVO data platform (responsibility with DG-IS/DAS)

- The data is processed by a third party (contractor) or the processing activity is conducted together with an external third party [IBM, Microsoft (Azure Cloud), AWS (AWS Cloud)]

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

**IBM:** [ChiefPrivacyOffice@ca.ibm.com](mailto:ChiefPrivacyOffice@ca.ibm.com)

**Microsoft:** EU-Datenschutzbeauftragter von Microsoft

One Microsoft Place  
South County Business Park  
Leopardstown  
Dublin 18  
D18 P521  
Irland  
Telefon: + 353 (1) 706-3117

**AWS:** <https://aws.amazon.com/contact-us/compliance-support/>

### 3. Purpose of the processing

The purpose of Medusa is to improve the quality and consistency of internal model reports which are created in the context of internal model investigations. The application therefore provides a set of functionalities, such as:

- Uploading a DARWIN-document (an internal model report) to the application
- Content analysis of the uploaded document and automated highlighting of suggested changes to improve consistency with model report created by other teams
- Web-based interface to extract findings from internal model reports and edit them separately
- Database search for internal model findings from past missions

To be able to fulfil this purpose Medusa will collect information about application users (usernames / user IDs) and their interactions with the application. In particular, information about editing operations users perform on internal model reports will be stored in the application database.

This is required to enable DG-OMI/IMI to fulfil their mandate to increase quality and consistency of internal model reports.

**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): Personal data is limited to data appearing in the news.

**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): IAM/IGAM usernames / user IDs

**(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): ARHS and AWS

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

Data are processed by third country entities:

Yes

Specify to which countries: The data is stored on AWS infrastructure, using the EU region.

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

Information will be stored with a retention period of 15 years in line with the ECB retention plan for harmonisation activities and consistency reviews of internal models (see 10.4.8.2 in the ECB Filing and Retention Plan)