



RECORD OF PROCESSING ACTIVITY

Administrative Inquiries

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Contact details:

European Central Bank

Sonnemannstrasse 22

60314 Frankfurt am Main

Germany

E-mail: info@ecb.europa.eu

Organisational unit responsible for the processing activity: Directorate Internal Audit (D-IA)

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: Audit Support and Investigations Division (D-IA ASI)

Under certain circumstances the data may be processed by a third party (contractor) or the activity may be conducted together with an external party.

3. Purpose of the processing

D-IA ASI processes personal data related to the preliminary assessment stage (i.e. assessment of cases related to a situation having a possible disciplinary dimension) and the administrative inquiry stage in line with ECB Administrative Circular on Administrative Inquiries. For further details: see [EDPS Opinion prior check on Internal Administrative Inquiries](#).

4. Description of the categories of data subjects

- ECB employee(s) and former employees
- Externals (agency staff, consultants, trainees or secondees)
- NCB or NCA counterparts (in the ESCB or SSM context)
- Members of the ECB Executive Board, of the ECB Governing Council and of the Supervisory Board
- Visitors to the ECB, including conference participants and speakers
- Contractors providing goods or services
- Informants, complainants, correspondents and enquirers
- Others: relatives and dependents of the data subject¹; in the context of preliminary assessment and/or internal administrative inquiries, personal data of any third parties may be processed in line with the ECB Administrative Circular on Administrative Inquiries (e.g. interviewing witnesses in the context of an administrative inquiry).

¹ Citizens to whom the ECB Conditions of Employment and Staff Rules or the Conditions of Short-Term Employment for Staff of the EBC and the Rules for Short-term Employment apply (for example the spouse or the children of a member of staff or of a short term employee).

5. Description of the categories of personal data processed²

General personal data:

- Personal details (name, address etc)
- Education & Training details
- Employment details
- Financial information
- Family, lifestyle and social circumstances
- Goods or services provided
- Other: soft data (allegations, declarations); social, behavioural data and other types of data specific to the processing operation, such as: legal qualification of the conduct or misconduct according to the ECB employment legal framework or other obligations; disciplinary sanctions imposed to the person concerned.

Information regarding administrative proceedings and/or any other regulatory investigations including financial liability.

D-IA ASI may access all staff, records, information, systems and property deemed necessary to carry out its responsibilities.

Special categories of personal data

- 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

² Depending on the case, all or part of the below data may be included in a preliminary assessment and/or administrative inquiry relating to the specific category of data subject(s) under investigation.

- Data regarding a natural person's sex life or sexual orientation
- Other categories of personal data: information relating to criminal proceedings; sanction and/or other administrative penalty; depending on the case, any other category of personal data may be processed.

6. The categories or recipients to whom the personal data have been or will be disclosed, including the recipient(s) of the data in Member States, third countries or international organisations

- Data subjects themselves
- Designated ECB staff members
- Members of ECB Executive Board
- The ECB Chief Services Officer
- Others: externals (consultants, trainees or secondees) working on/supporting an investigation; when applicable, members of the ECB Governing Council and/or the Supervisory Board as the case may require; when applicable, on a need to know basis and in compliance with the relevant legal framework, bodies charged with monitoring or inspection tasks in application of EU law (e.g. European Court of Auditors, European Anti-fraud Office, the European Data Protection Supervisor) and competent national authorities.

7. Retention time

The personal data will be kept for a maximum period of 10 years.