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ECB-PUBLIC  
UPDATABLE

## RECORD OF PROCESSING ACTIVITY

Communication initiatives for the wider public

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

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: European Central Bank (ECB)/Directorate General Communications (DG-C)

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: Design & Digital (DND) and Public Communication (PCOM)
  
- The processing operation is for certain activities conducted together with an external third party Consortium KOMMITMENT by ICF NEXT SA, Air Creative Associates SA, Initiative Media and WIDE.  
<https://www.icf.com/legal/privacy-statement>  
<https://air.be/privacy>

### 3. Purpose of the processing

For communication initiatives for the wider public, personal data is processed at several instances, including when conducting:

- focus groups and testing for specific deliverables for the communication initiatives to the wider public,
- analysis of social media activity for potential social media influencer collaborations,
- mapping of media and stakeholders to be contacted as possible multipliers for outreach activities, and
- database development for newsletter subscriptions and gamification activities, such as contact details (i.e. email addresses) and
- evaluations and impact assessments of the communication initiatives to the wider public.

In all instances, only the relevant data required will be processed.

### 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): Journalists, focus groups participants, social media influencers, opinion leaders, counterparts in youth organisations/associations, employees of public and private sector companies and organisations other than from the ESCB as well as other EU bodies and 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
- Other (please give details): gender, age bracket, social media handles, number of followers, home country

**(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): The external provider KOMMITMENT Consortium by ICF NEXT SA and Air Creative Associates SA, in the framework of the external communications campaign to the wider public

## 7. Transfers to third countries or an international organisation

Data are transferred to third country recipients:

- Yes
  - Adequacy Decision of the European Commission
  - Standard Contractual Clauses
  - Binding Corporate Rules
  - Memorandum of Understanding between public authorities
- No

## 8. Retention time

For the impact assessment of the external communications campaign to the wider public, reports containing personal data will be stored for a maximum of five years and will then be destroyed/deleted. Upon the instructions of the ECB, once the communications campaign has concluded, the external provider will delete the personal data after a period of six months. Automatic backups will also be deleted from the provider's servers after six months.