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ECB-PUBLIC

UPDATABLE

## RECORD OF PROCESSING ACTIVITY

### Personal data processed in the context of IGAM identity creation

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

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity:

Directorate General Information Systems / Digital Security Services

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:

- Directorate General Information Systems / Digital Security Services
- ECB Organizational units

The data is processed by a third party (contractor) or the processing operation is conducted together with external third parties: Oracle, Airbus Protect SAS, ATOS Benelux, Unisys.

#### 3. Purpose of the processing

The Identity Governance and Administration Management (IGAM) IT Service is implementing a set of solutions with the **aim of improving IT security at the ECB**. In particular, the personal data are processed for providing users access to the ECB's IT resources. This includes the initial login to ECB's infrastructure (e.g. standard account in ECB01) as well as any systems that leverage this initial account such as the Intranet,

File Storage, DARWIN and others.

Due to specific requirements of certain ECB IT systems, user information may be synchronised from IGAM to these systems. Those systems might not be hosted at ECB, e.g. at Microsoft Azure. This is done under responsibility of each system owner, in the scope of their own Privacy Statement/Record of processing activity.

#### 4. Description of the categories of data subjects

- ECB staff
- Non-ECB staff (agency staff, consultants, cost-free trainees or cost-free secondees working at the ECB)
- NCB or NCA counterparts (in the ESCB or SSM context)
- Visitors to the ECB
- Contractors providing goods or services
- Complainants, correspondents and enquirers could be affected through ASTRA
- Relatives of the data subject (ECB Connect)
- 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:

IGAM might be incidentally processing some data that may indicate special interests of a user, which might in turn allow to deduce some data on the user.

- 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
- Information regarding an individual'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
  - Delegates nominated by ECB managers
  - Staff appointed by DSS

Designated NCB or NCA staff members in the ESCB or SSM context

Other (please specify):

- Designated staff of 3rd parties listed in Section 2
- Other ECB IT Services as stated in their dedicated record of data processing activity

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

Data are transferred to third country recipients:

Yes (only IGAM Reporting, all other data processing is on ECB premises)

Specify to which country: Processing in European data centres of US based cloud providers

Specify under which safeguards:

Adequacy Decision of the European Commission

Standard Contractual Clauses

Binding Corporate Rules

Memorandum of Understanding between public authorities

No

**8. Retention time**

10 years after the end of contract or last pension claim, except for ECB staff number and user login which will be stored permanently due to ESCB/SSM policy requirements regarding ECB's public key infrastructure.