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ECB-PUBLIC
UPDATABLE

RECORD OF PROCESSING ACTIVITY

Application Lifecycle Management (ALM)

1. Controller(s) of data processing activities

Controller: European Central Bank

Organisational unit responsible for the processing activity: European Central Bank (ECB)/DG-IS

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:
- The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party: iwelcome.com, Unisys, Microfocus - for further information please refer to the [iWelcome privacy policy](#), [Unisys privacy statement](#) and [Microfocus privacy policy](#)

3. Purpose of the processing

Application Lifecycle Management (ALM) is a set of software tools for application development and testing.

It includes tools for requirements management, defect management, test planning, functional testing, performance testing and developer management.

ALM is intended to provide Information Technology departments with a centralised application

management platform for managing and automating within and across application teams and throughout the complete process of developing an application, within a single workflow.

The personal data are processed for the creation of user accounts for ALM which is the ECB's application for IT requirements and test management.

In order to create accounts for the external users to access the application and authenticate securely, personal information is a mandatory requirement.

The personal data is collected by ECB or Unisys staff for the purpose of creating user accounts in iWelcome (system that provides access to multiple ECB applications facing externally). iWelcome requires multifactor authentication by default, and therefore the full name, phone number and email address are required.

This data is automatically synchronised between iWelcome and ALM, in order to allow the basic functionalities of the system (provide granular access to different areas of ALM).

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): 3UM service provider (iWelcome) and Unisys.

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

In ALM the personal data will be kept until the user account is deleted manually upon request from project coordinators. Data on 3UM and the IT Service Portal is managed according to the own services' retention policies as there are no specific requirements from ALM. The retention time in 3UM has been set at 2 years.

When a user is deleted the associated personal data is also deleted.

User reconciliation is performed on a yearly basis and therefore effectively the retention period for an inactive user does not exceed one year.

The forms for the collection of personal data are deleted after the account has been created.