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ECB-PUBLIC
UPDATABLE

RECORD OF PROCESSING ACTIVITY

Miro Digital Whiteboards

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

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

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 RealtimeBoard, Inc. dba Miro
Link to privacy statement if available [Miro Privacy Statement](#)

3. Purpose of the processing

ECB makes use of Miro Digital Whiteboard to enable services for communication and collaboration. Personal data is required for the provisioning of services by Miro.

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): Any individual participating in a Miro Board

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): Aggregated information for IP address logs, device and location information.

(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): Designated Miro staff members and staff members of their contractors for troubleshooting and billing purposes

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 (RealtimeBoard Miro Enterprise Data governance to restrict data in EEA)

8. Retention time

Users can terminate their account. After account termination, data will automatically be deleted. Backups in production will be retained for 30 days and backups in secondary will be retained for 180 days before being automatically deleted.

Upon termination of their account, customers can submit a Data Subject Request and request Miro to delete all their data. Customers can submit this request to privacy@miro.com