



09/11/2022(DATE OF PUBLICATION/LAST UPDATE)

ECB-PUBLIC
UPDATABLE

RECORD OF PROCESSING ACTIVITY

ECB Learning Solution

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: Directorate General Human Resources

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 (imc AG)¹

Link to privacy statement if available

<https://www.im-c.com/dataprivacy/>

¹ Microsoft is a sub-processor and provider of infrastructure and platform services (Microsoft Azure IaaS/PaaS) of the imc Learning Suite.

3. Purpose of the processing

Personal data are processed to support DG-HR in provisioning HR Learning & Development services.

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, email address etc)
- Education & Training details

- Employment details
- Financial details
- Family, lifestyle and social circumstances
- Goods or services provided
- Other (please give details):

For ECB users:

- Personal information data (staff ID, gender, age, nationality), contract information (type, start and end date), salary band (for salary-band specific trainings like Leadership trainings), position data (role at the ECB, organisational assignment/ structure);
- Learning & development-related data (including record of attendance), absence/attendance data (information will not be stored in the system but available via the SAP integration).

For NCA and NCB users:

- Personal information data (Institution, gender, age,), learning & development-related data (including history of attendance);
- Skills profile of the users (on a voluntary basis, when setting up their profiles).

(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): imc (for IT support)².

7. Transfers to/Access from third countries or an international organisation

Data are processed by third country entities:

Yes

Specify to which countries: USA

Specify under which safeguards:

Adequacy Decision of the European Commission

Standard Contractual Clauses

Binding Corporate Rules

Administrative arrangement containing enforceable and effective data subject rights

² And its sub-processor Microsoft Azure in rare exceptional circumstances.

If the third country's legislation and/or practices impinge on the effectiveness of appropriate safeguards, the personal data can only be transferred to, accessed from or processed in such third country when sufficient 'supplementary measures' are taken to ensure an essentially equivalent level of protection to that guaranteed within the EEA. These supplementary measures are implemented on a case-by-case basis and may be technical (such as encryption), organisational and/or contractual.

No

8. Retention time

Personal data will be deleted in line with the ECB-wide filing and retention plan. This lays down a period between 5-10 years for Training, depending on the specific topic.