EUROPEAN CENTRAL BANK

EUROSYSTEM

RECORD OF PROCESSING ACTIVITY

Virtual Lab

1. Controller(s) of data processing activities
Controller: European Central Bank (ECB) Organisational unit responsible for the processing activity: DG-SGO/TIN & DG-IS/PRS Contact point[1]: virtuallab@ecb.europa.eu 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: Directorate General - SSM Governance and Organizations / Technology and Innovation Division (DG-SGO/TIN) & Directorate General Information Systems / Prudential Domain Services Division ☒ The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party [Microsoft].

3. Purpose of the processing
The objective of the Virtual Lab is to provide an open and accessible platform, where advanced users can engage in complex data science projects and where newcomers can explore and advance their skills on AI. The Virtual Lab aims to foster a culture of collaboration and

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[1] Please provide a functional e-mail account of the competent unit in case of questions.

innovation across the ESCB, SSM and beyond.

The benefits of the platform include improvements in collaboration, machine learning, communication, document collaboration, co-editing, and knowledge management, which ultimately is expected to contribute to make the supervision process easier but also support other business areas (such as data analytics and monitoring, collaboration across various teams etc.). Please be aware that while ECB users can collaborate on documents, they confirm that all business-related data is be stored in DARWIN.

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): SRB, restricted access to Tiger Team (FCA, FED, BoE).

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): If multi-factor authentication (MFA) is used the user will have two options for authentication. The first option is authentication by phone, which requires the processing of the user's phone number. The second option is authentication using the authenticator app, which requires the processing of the user's device name.

(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

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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): Virtual Lab users can view the first name, last name, e-mail address, country the user is located at, organization the user belongs to, projects user is an owner of, projects user is a member of, summary of experience (optional), tags related to experience/expertise (optional), profile picture (optional) of other users involved in their projects.

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

Data are processed by third country entities:

☒ Yes

Data is transferred to the USA (processed by Microsoft, stored in datacentres located in the European Economic Area/European Union (aggregated and/or pseudonymous service-generated data is stored in datacentres located in the United States).

☒ Adequacy Decision of the European Commission

☒ Standard Contractual Clauses

☐ Binding Corporate Rules

☐ Administrative arrangement containing enforceable and effective data subject rights

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

Refer to [ECB's Filing and Retention Plan](#)

Please note that all profile information is deleted when a user leaves the Virtual Lab after the default period of 30 days is over (exception would be if a user is blocked).

Please find the deletion and retention periods in the table below:

Resource	Deletion	Notification
VL Project	VL project deletion is triggered automatically after 4 months of inactivity* * Inactivity for VL projects defined as: • ML workspace is not active** • the project has not been updated in 11 months • the project has not been accessed in 120 days • no files were updated in the last 11 months • Teams has not been active in the last 90 days	Project members & owners will receive three e-mail notifications each month prior to the project deletion, with the final reminder sent one month before deletion.
VL Machine Learning workspace – general data retention	VL Machine Learning workspace deletion is triggered automatically after 3 months of inactivity (with 3 e-mail reminders) * * Inactivity for VL ML workspaces defined as: • the modification date is at least 30 days prior. • no user activity has occurred within the past 90 days. (e.g. access notebook) • Compute instances have remained inactive for 30 days • Endpoints have not been modified within the last 30 days. • there has been no activity on endpoints for 90 days.	Project members & owners will receive three e-mail notifications each month prior to the Machine Learning workspace deletion, with the final reminder sent one month before deletion.
Files	Files will be deleted 1 year after the last edit.	Project owners will receive one e-mail notifications 10 days prior to the file deletion.
MS Planner	Attachments and files added, depending on their storage location are deleted 1 year after the last edit.	no
MS Teams	Attachments and files added, depending on their storage location are deleted 1 year	no

	after the last edit.	
OneNote/Wiki	Will be deleted 1 year after the last edit.	no
CPU/GPU compute instance	VL Machine Learning compute resources (such as CPU and GPU instances) are automatically stopped after 1 hour of inactivity and deleted after 30 days of inactivity	Compute Instance creators will receive one e-mail notifications 7 days prior to the Compute Instance deletion.
Git repository	VL git repositories are currently not deleted unless they belong to an inactive project* which is deleted.	see VL Project.