

## RECORD OF PROCESSING ACTIVITY

Implementation of the Single Code of Conduct for High-Level Officials

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

Controller: European Central Bank

Organisational unit responsible for the processing activity: European Central Bank (ECB)/DG Secretariat/Division Compliance and Governance; for specific processing activities: DG SSM Governance & Operations, Division SSM Secretariat and DG Secretariat, Division Secretariat

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 Secretariat, Division Compliance and Governance  
and for specific processing activities, Division SSM Secretariat and  
Division Secretariat

### 3. Purpose of the processing

As an institution of the European Union (EU), the European Central Bank (ECB) is expected to serve the public interest, live up to the highest expectations of integrity and adhere to the highest standards of ethics in order to safeguard the reputation of the ECB.

The Code of Conduct for high-level ECB officials ('Single Code') aims to create a common set of rules for all the members of its high-level bodies by establishing a code which reflects best practices within the central banking and supervisory communities as well as of the fellow EU institutions.

In order to ensure the adherence to the Code of Conduct, the ECB processes personal data such as names, private activities, official mandates, and financial activities of high-level ECB officials, as well as information related to the gainful occupation of relatives of high-level ECB officials in the context of the following provisions:

- publication of declaration of interests (Article 10 and Template Declaration of Interests);
- publication of cases of non-compliance (Article 18);
- publication of calendars (Guiding principles for external communication for high-level officials of the ECB)
- assessment by the Ethics Committee (EC) on potential conflicts of interests (Article 11 and 12) and post mandate gainful employment (Article 18)

### 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): High-level ECB officials

**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): Certain information is published

## 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

Declarations of interests and compliance are updated every year and old versions are removed from the ECB's website. All declarations of interests and declarations of compliance are retained permanently for the purpose of accountability of the ECB and in order to be able to demonstrate the lawfulness of the decision-making process.

As records deemed of future historical value, the assessments and opinions by the have been assigned a permanent retention period but they are removed from the ECB website once the high-level ECB Official ceases to hold a function in the ECB's high-level bodies

The calendars of EB members published in the ECB website are also kept permanently.