

## RECORD OF PROCESSING ACTIVITY<sup>1</sup>

### NAME OF PROCESSING ACTIVITY<sup>2</sup>:

Organisation of meetings and conferences with external and internal participants

#### 1) Controller(s)<sup>3</sup> of data processing operation (Article 31.1(a))

Controller: European Central Bank (ECB)

Organisational unit responsible<sup>4</sup> for the processing operation: *various, depending on the specific unit involved*

Contact person<sup>5</sup>: Data Protection Officer, [DPO@ecb.europa.eu](mailto:DPO@ecb.europa.eu)

#### 2) Who is actually processing the data?<sup>6</sup> (Article 31.1(a))

☒ The data are processed by the ECB itself

Organisational unit carrying out the processing: *various, depending on the specific unit involved*

☒ The data are processed by a third party (contractor) or the processing operation is conducted together with an external third party: *external provider that hosts the external website where people can register to participate in the meeting or conference*

Contact point at external third party (e.g. Privacy/Data Protection Officer):

*Depends on the external provider*

<sup>1</sup> In accordance with [Article 31 of Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

<sup>2</sup> **Personal data** are defined as any information relating to an identified or identifiable natural person, i.e. someone who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or by reference to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the person. This information may, for example, be a name, date of birth, telephone number, biometric data, medical data, a picture, professional details, etc.

**Processing** means any operation or set of operations performed on personal data or on sets of personal data, whether or not by automatic means. This includes collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of the data.

<sup>3</sup> If there is more than one controller (e.g. joint ESCB operations), all controllers need to be listed here.

<sup>4</sup> This is the unit that decides that the processing will take place and why.

<sup>5</sup> Please provide the name of the contact person and a functional email account for the competent unit.

<sup>6</sup> Is the ECB conducting the processing? Or has an external provider been contracted for this purpose?

### 3) Purpose of the processing (Article 31.1(b))

Why are the personal data being processed? Specify the rationale and underlying reason for the processing.

The purpose of processing the personal data of participants is:

- to ensure that meeting requesters and meeting owners have a clear understanding of who is participating (registration of meeting participants);
- to ensure that the ECB's Welcome Desk and other welcome desks at external venues can prepare security badges to enable meeting participants to 1) enter the ECB's premises or external venues and 2) pass through the access control systems and procedures;
- to ensure that supporting documentation for meetings (name badges, name plates, seating plans, list of participants for distribution to all participants, etc.) can be delivered;
- to ensure the provision of adequate statistical data for the purpose of analysing organisational performance related to meetings, conferences and events (for example, the carbon footprint generated, the service and capacity demands involved, etc.).

In addition to enabling services to be provided to regular meeting participants, data relating to VIP meeting participants, for example, those attending Council Meetings, are processed in order to:

- ensure that the relevant VIP services (individual drivers and cars for participants, airport pick-up, access to airport lounge, etc.) can be provided;
- ensure the allocation of office spaces to individual participants and the delivery of associated services and documentation.

### 4) Description of the processing

*Describe the individual steps used for the processing*

Various organisational units are responsible for the organisation of conferences/ meetings with internal and external participants.

## 5) Lawfulness of the processing (Article 5(a)–(d)): Processing necessary for:

*Mention the legal basis which justifies the processing*

- ☒ A task carried out in the public interest or in the exercise of official authority vested in the ECB (including management and functioning of the institution)

*Examples of legal basis: Article 11.6 of the Statute of the ESCB (for current ECB business activities); ECB legal acts (Conditions of Employment, Staff Rules, Administrative Circular etc.*

- ☐ Compliance with a legal obligation to which the ECB is subject
- ☐ Necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract
- ☐ Data subject has given consent (ex ante, explicit, informed)

*Describe how consent will be collected and where the proof of consent will be stored*

### Important Note

Consent may not be the most appropriate legal basis, in particular in the employment context. However, if you wish to use consent as legal basis, ensure that it complies with the following: it must be freely given, specific, informed and unambiguous consent. Contact the DPO if you need further clarifications.

## 6) Description of the categories of data subjects (Article 31.1(c))

*Whose personal data are being processed?*

- ☐ ECB staff
- ☐ Non-ECB staff (agency staff, consultants, cost-free trainees or cost-free secondees working at the ECB)
- ☒ NCB or NCA counterparts (within the ESCB or SSM)
- ☒ Visitors to the ECB
- ☐ Contractors providing goods or services
- ☐ Complainants, correspondents and enquirers
- ☒ Relatives of the data subject
- ☒ Other (please specify):

*speakers and other participants in the conference / meeting*

**7) Categories of personal data processed (Article 31.1(c))***Please tick all categories that apply and give details where appropriate***(a) General personal data:**

The personal data contain:

- ☒ Personal details (name, address etc.)
- ☐ Education/training details
- ☒ Employment details
- ☐ Financial details
- ☐ Family, lifestyle and social circumstances
- ☐ Goods or services provided
- ☒ Other (please specify):
  - travel details (arrival and departure times and means of transportation, flight/train numbers and destinations arriving from/departing to, additional free text on travel, e.g. “own driver”)
  - hotel details (length of stay, required room, smoker/non-smoker)
  - office which the participant will use during their stay at the ECB (office number, phone number)

**(b) Sensitive personal data**

The personal data reveal:

- ☐ Racial or ethnic origin
- ☐ Political opinions
- ☐ Religious or philosophical beliefs
- ☐ Trade union membership
- ☐ Genetic, biometric or data concerning health
- ☐ Information regarding an individual's sex life or sexual orientation

**Important Note**

If you have ticked any of the special categories of personal data boxes, please contact the DPO before processing the data further.

- 8) Categories of recipients to whom the personal data have been or will be disclosed, including recipients of the data in Member States, third countries or international organisations (Article 31.1 (d))

*Recipients are defined as all parties who have access to the personal data*

- ☐ Data subjects themselves
- ☐ Managers of data subjects
- ☒ Designated ECB staff members
- ☒ Designated NCB or NCA staff members within the ESCB or SSM
- ☒ Other (please specify): *selected staff of the external provider*

- 9) Transfers to third countries or international organisations (Article 31.1 (e))

*If the personal data are transferred outside the European Economic Area (EEA) or can be accessed from outside the EEA, this needs to be specifically mentioned.*

Data are transferred to third country recipients:

- ☐ Yes
  - Specify to which country:
  - Specify under which safeguards:
    - ☐ Adequacy Decision by the European Commission
    - ☐ Standard contractual clauses
    - ☐ Binding corporate rules
    - ☐ Memorandum of Understanding between public authorities
- ☒ No

#### **Important Note**

**If no safeguards are applicable, please contact the DPO before processing the data further.**

## 10) Technical and organisational security measures (Article 31.1(g))

*Please specify where the data are stored during and after processing*

Where are the data stored?

- ☐ ECB network shared drive
- ☐ Outlook folder(s)
- ☒ DARWIN
- ☐ Hardcopy file
- ☒ Cloud (give details, e.g. public cloud)
- ☐ Servers of external provider
- ☒ Other (please specify):
  - Planon
  - Mendix
  - External & internal registration tool

## 11) Retention time (Article 4(e))

*How long will the data be retained and what is the justification for the retention period? Please note that the ECB has pre-determined retention periods for most types of document. For more details, see the [ECB Retention Plan](#).*

The personal data will be stored for a maximum period of ten years in line with the [ECB Retention Plan](#) (for instance, 6.6.6.2.). However, five-year retention periods may be assigned instead.

## 12) Consultation with DG-IS

*In some cases, DG-IS needs to be consulted, in particular regarding the IT security aspects of a processing activity. This is necessary, for example, when an external provider is used to host data on their platform or elsewhere outside the ECB, or when an external provider otherwise processes the data on behalf of the ECB.*

Has DG-IS been consulted on the processing operation?

- ☒ Yes
- ☐ No

13) Publication of the record in the [external DPO register](#)

*Pursuant to Article 31(5) the record of processing activity must be published internally and externally, unless there are specific reasons (confidentiality, covered by a wide record) not to do so.*

Will the record be published in the external DPO register?

☒ Yes

☐ No

**Thank you for completing the form.**  
**Now please send it to [knowledge.management@ecb.europa.eu](mailto:knowledge.management@ecb.europa.eu)**