



DG-HR/BPA

UPDATABLE

RECORD OF PROCESSING ACTIVITY ¹

NAME OF PROCESSING ACTIVITY²:

Random draw for establishing the Election Committee for elected committees (R-tool)

1) Controller(s)³ of data processing activities (Article 31.1(a))

Controller: European Central Bank (ECB)

Organisational unit responsible⁴ for the processing activity: *Directorate General Human Resources, Staff Relations Team*

Contact point⁵: Staff Relations team via [Contact HR](#)

ECB Data Protection Officer (DPO): DPO@ecb.europa.eu

2) Who is actually conducting the processing activity? (Article 31.1(a))⁶

☒ The data is processed by the ECB itself

The organisational unit conducting the processing activity is:

Directorate General Human Resources, Business Partnering Division, Staff Relations Team, and Employee Services Division, HR Analytics Team⁷

☐ The data is processed by a third party (contractor) or the processing activity is conducted together with an external third party [mention third party]

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

¹ According to [Article 31 of the 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.

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

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automatic means, such as 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.

³ In case of more than one controller (e.g. joint ESCB operations), all controllers need to be listed here.

⁴ This is the unit that decides that the processing takes place and why.

⁵ Please provide a functional email account of the competent unit in case of questions.

⁶ Is the ECB itself conducting the processing? Or has a provider been contracted?

⁷ Until the 1st of March 2026, later the HR Digitalisation and Employee Relations Division will be responsible.

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.

An automated tool ("R-tool") has been developed to carry out the random draw for establishing the Election Committee for elected committees as foreseen in the Administrative Circular 1/2025 amending Administrative Circular 1/2019. The draw should ensure diversity criteria as regards nationality, salary band, business area and gender among the Election Committee members.

4) Description of the processing

Describe the individual steps used for the processing.

The processing involves the use of a custom-built R-tool designed to conduct the random draw for the Election Committee members, while adhering to predefined criteria outlined in the AC on election rules. The process includes:

1. The definition of the pool of eligible staff members based on eligibility criteria (e.g., employment status, contract type, and length of service).
2. The application of specific selection criteria, including gender balance, nationality limits, business area limits, and salary band limits.
3. Conducting the random draw using the tool, which ensures compliance with the predefined criteria.
4. Replacement of Election Committee members, if required, following the same process and criteria as the original draw.

The processing will ensure confidentiality and data protection by concealing the pool of eligible staff members during the draw.

1. Preparation of the Pool of Eligible Staff Members:

- A defined pool of eligible staff members is created based on the eligibility criteria set forth in the AC on election rules.
- Inclusion criteria: Staff members eligible to vote in the Staff Committee elections, including those with permanent or fixed-term contracts (e.g., Graduate Programme participants and fixed-term non-convertible contracts) who have been working at the ECB for at least three months.
- Exclusion criteria: CSO and members of the Staff Relations team. Staff members on types of leave that release headcount, since they would not be able to carry out the role of Election Committee members i.e. Staff who on the day of the draw are on: Adoption Leave, Maternity Leave, Full Incapacity and

Unpaid Leave (Professional Reason, Educational Reason, Personal Reason, Parental Leave, Military Service, Other Reason) independent of length, and Long-term Sick Leave that is longer than six weeks.

- The preparation ensures compliance with the principle of data minimization, processing only the data strictly necessary for the defined purpose.

2. Execution of the Random Draw:

- The custom-built R tool performs the random draw to select the Election Committee members from the pool of eligible staff.
- The tool incorporates predefined criteria to ensure compliance with the AC on election rules. These criteria include:
 - **Gender Balance:** The committee must reflect gender balance for equitable representation.
 - **Numerical Limits:**
 - A maximum of two members per nationality (first nationality of staff members as it is recorded in the system).
 - A maximum of two members per business area.
 - A maximum of two members belonging to salary bands A to E.
 - A maximum of four members belonging to salary bands E/F to H.
 - A maximum of one member belonging to salary bands I to L.
- To ensure confidentiality and compliance with the integrity and confidentiality principle (Article 4(f) EUDPR), the pool of eligible staff members remains concealed during the random draw process.

3. Appointment of Election Committee Members:

- The first three members drawn are appointed for three years, while the next four are appointed for six years, as outlined in the AC.
- If a member needs to be excused due to objectively legitimate reasons (e.g., prolonged sick leave), the replacement process is initiated.

4. Replacement Process:

- If an Election Committee member is excused before formal appointment, a replacement is drawn from the same pool of eligible staff members originally defined.
- If a member needs to be replaced following formal CSO appointment or during the term of their appointment, the pool of eligible staff members is updated to reflect eligibility as of the replacement date.

- The replacement process adheres to the same criteria outlined in the AC, ensuring compliance with gender balance, nationality limits, business area limits, and salary bands.

Please provide any useful link to where the processing occurs (e.g. in DARWIN, if the documentation is in Darwin): <https://darwin.escb.eu/livelink/livelink/app/nodes/1876682653>

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)

Article 48 of the Conditions of Employment for Staff of the European Central Bank;

Article 9.1 of the European Central Bank Staff Rules;

Article 2.2(ii) of Annex III and Article 26(c) of Annex IIIa to the Conditions of Employment for Staff of the European Central Bank;

Article 5 of the Terms of Reference of the Oversight Committee;

Administrative Circular 1/2025 amending Administrative Circular 1/2019.

- ☐ 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 (in the ESCB or SSM context)
- ☐ Visitors to the ECB
- ☐ Contractors providing goods or service
- ☐ Complainants, correspondents and enquirers

- ☐ Relatives of the data subject
- ☐ Other (please specify):

7) Categories of personal data processed (Article 31.1(c))

Please tick all that apply and give details where appropriate

(a) General personal data:

The personal data contains:

- ☒ Personal details (name, address etc)
- ☐ Education & Training details
- ☒ Employment details (*in particular business area and salary band*)
- ☐ Financial details

Family, lifestyle and social circumstances (*Regarding the processing of absence data no sensitive data is disclosed during the exclusion procedure in creating the eligible pool. Certain categories of data subjects are excluded due to absences, however this is done generally, for different types of absences. Due to this, it is nowhere disclosed or separately processed, which concrete data subjects would be excluded on the grounds of sensitive personal data (such as medical data). Absence-related data is used only as a binary eligibility criterion and is not individualized. Such data are not stored, visualised, or disclosed as part of the outputs of the tool.*)

- ☐ Goods or services provided
- ☒ Other (please give details): *nationality, gender, information on potential conflicts of interest*

(b) Special categories of personal data (Article 10)

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 (*Regarding the processing of absence data no sensitive data is disclosed during the exclusion procedure in creating the eligible pool. Certain categories of data subjects are excluded due to absences, however this is done generally, for different types of absences. Due to this, it is nowhere disclosed or separately processed, which concrete data subjects would be excluded on the grounds of sensitive personal data (such as medical data). Absence-related data is used only as a binary eligibility criterion and is not individualized. Such data are not stored, visualised, or disclosed as part of the outputs of the tool.*)

- ☒ 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) 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 (Article 31.1 (d))

Recipients are all parties who have access to the personal data

- ☒ Data subjects themselves
- ☒ Managers of data subjects (*managers of the seven appointed Election Committee members will be informed only of appointed Election Committee member if employed in their respective business unit*)
- ☒ Designated ECB staff members (*of the Staff Relations and Analytics Team conducting the processing, they will only have access to the names of prospective members of the Election Committee*)
- ☐ Designated NCB or NCA staff members in the ESCB or SSM context
- ☒ Other (please specify):
- Chief Services Officer (only access to personal data, i.e. the names of prospective members of Election Committee for the purpose of appointment or granting exemptions);*
- Members of the Staff Committee and Oversight Committee who will be invited to attend the random draw according to Administrative Circular 1/2025 amending Administrative Circular 1/2019 (only access to personal data, i.e. the names of prospective members of Election Committee);*
- A staff member of the Institutional Law Division, who will attend the draw;*
- All ECB and non-ECB staff (will be informed via intranet announcement only of appointed Election Committee members)*

9) Transfers to third countries or an international organisation (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 processed by third country entities:

- ☐ Yes
- Specify to which countries:
- 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

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. The supplementary measures are implemented on a case-by-case basis and may be technical (such as encryption), organisational and/or contractual.

☒ 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 the processing

How is the data stored?

- ☐ ECB network shared drive
- ☐ Outlook Folder(s)
- ☒ DARWIN
- ☐ Hardcopy file
- ☐ Cloud (give details, e.g. public cloud)
- ☐ Local servers of external provider
- ☒ Other (please specify): *R-tool itself*

11) Retention time (Article 4(e))

How long will the data be retained and what is the justification for the retention period? Keep in mind that the ECB has pre-determined retention periods for most types of documents. You can check the [ECB Retention Plan](#) here.

Personal data (i.e. the names of appointed staff members) pertaining to the results of the draw for establishing the Election Committee for elected committees Election Committee members will be stored permanently (in analogy to series 3.8.1.1 of [ECB-wide filing and retention plan](#)).

Other personal data processed in the context of the draw such as preliminary results or correspondence on eligibility criteria and exemptions will be deleted once the time limit for lodging an appeal against the election itself has expired and no appeal has been lodged.

12) Consultation with DG-IS

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

Was DG-IS consulted on the processing activity?

- ☐ Yes
- ☒ No

If yes, please describe the nature of the consultation and the outcome:

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

Pursuant to Art. 31(5) Reg. 2018/1725 the record of processing activity needs to be published internally and externally unless there are specific reasons (confidentiality, covered by a wide record)

Will the external record be published in the external DPO register?

- ☒ Yes
- ☐ No

If no, please describe the reasons of the decision:

Thank you for completing the form.
Now please send it to knowledge.management@ecb.europa.eu