

RECORD OF PROCESSING ACTIVITY

Email services

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: DG-IS / IOS

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 Information Systems / Infrastructure & Operations Services
Division (DG-IS / IOS)

- ☒ The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party Unisys / Microsoft / Symantec

<https://www.unisys.com/unisys-legal/privacy/>

<https://www.microsoft.com/en-gb/concern/privacy>

<https://www.broadcom.com/company/legal/privacy>

3. Purpose of the processing

The primary purpose of the Email Service is to provide a secure and reliable platform for sending, receiving and storing emails and their attachments

- within the ECB,
- between the ECB and the ESCB and
- between the ECB and external parties over the Internet.

The Email Services are enriched by standard collaboration tools such as address books, public folders, calendars, notes and task lists.

Every email item entering or leaving an ECB systems is sent through a chain of email gateways on which it leaves a trace of its header. This contains several technical parameters out of which relevant for personal data are: date, time, client IP address, username, subject, envelope sender, envelope recipients, names of attachments. These are used by the ECB Managed Service Provider Email team, Unisys, to troubleshoot email routing. Header data may be made available to Microsoft, Symantec or Cisco in case of technical support cases opened with them.

The ECB uses Symantec's cloud email security service for automated identification and blocking virus and spam emails. Personal data that might be sent to or from the ECB in an email is subject to the same automated processing as any other email communication.

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):
Anyone mentioned on an email to or from the ECB email domains

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): *Microsoft and sub-contractors*

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

Data are processed by third country entities:

- ☒ Yes
- Yes (pseudonymised¹ and/ or aggregated² service generated data³)*

¹ Pseudonymized data is data for which all identifiers are substituted by aliases for which the alias assignment is such that it cannot be reversed by reasonable efforts of anyone other than the party that performed them.

This corresponds to data resulting from the process of "pseudonymisation" in ISO/IEC 29100:2011, 2.24 and described as "pseudonymous data" in ISO/IEC 29100:2011, 4.4.4.

² Aggregated data is information (statistics and metrics) that is computed from multiple individuals or sources, such as across an organisation or across a broad market segment. As defined by ISO/IEC 19944:2017 (8.3.6). Microsoft aggregates data from pseudonymised data while providing online services for most processing for business operations. This aggregated data does not retain individual-level data and thus is no longer Personal Data.

³ The service generated data includes all data "generated" or "derived" by Microsoft through operation of an online service. Microsoft aggregates this data from its online services and uses it to make sure performance, security, scaling, and other services that impact the customer experience are operating at the levels their customers require.

Specify to which country: *USA (24/7 follow the sun support organisation, the access to data can eventually happen globally)*

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. 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

Log retention of email header data is configured to 30 days. For Exchange online 90 days.