



## RECORD OF PROCESSING ACTIVITY

### Medical Centre activities

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

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity:

*DG-HR / Employment Services Division / ECB Medical Centre*

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 Human Resources, Employment Services, Medical Centre*

☒ The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party:

Medical Advisers contracted by the ECB:

- Dr. Hans Bettermann
- Dr. Raoul Breitzkreuz
- Dr. Uwe Lang
- Dr. Gabrijela Milankovic
- Dr. Axel Telzerow

#### 3. Purpose of the processing

The personal data is collected, processed and stored to provide occupational medical services.

**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):

**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):
  - ECB Medical Advisers;
  - External doctors used for some procedures (e.g. disability procedure according to Annex IV ECB Conditions of Employment, underperformance procedure according to Article 8.5 ECB Staff Rules, accident or occupational disease procedure according to Article 6.3 ECB Staff Rules, Medical Committee procedures according to Article ECB-PUBLIC 6.6 of the ECB Staff Rules);
  - Allianz and Cigna (as administrator of the ECB health insurance for the purpose of administering health insurance benefits under the accident or occupational disease procedure according to Article 6.3 ECB Staff Rules and for the purpose of administering health insurance benefits under Annex III ECB Staff Rules).

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

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. 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

Personal data are kept for a maximum period of 10 years after the last medical consultation or treatment.