



RECORD OF PROCESSING ACTIVITY

PEOPLE ANALYTICS

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: DG-HR

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 Human Resources (DG-HR)

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

Link to privacy statement if available

3. Purpose of the processing

- Solution and policy development to enable Human Resources (HR) decisions: Supporting HR management, HR policy experts and management across all ECB business areas in order to deliver first class customised policies and solution designs in the field of HR Management. Considering not only the opinion of experts and best practices of other organisations, but also the ECB's internal data and insights generated from such data enables ECB decision-makers to make evidence-based, effective and fair decisions.

- Running and enhancing business processes: Preparing data and reports (including aggregated projections) to support the ECB in the effective, efficient and transparent execution of business processes in HR.
- Statistical and research purposes: Ad-hoc requests such as for the benchmarking of HR policies and processes with other organisations, and valid statistical requests from official authorities.
- Sharing data and statistics with external parties: Personal data may be processed to share aggregated data in non-personal formats with non-ECB data recipients (e.g. national central banks or national central authorities, other international financial institutions or other EU institutions). Personal data may be shared with specific non-ECB parties once the Data Protection Office and the Compliance & Governance Office have been sufficiently involved in line with the ECB's legal obligations, such as police and judicial cooperation in criminal matters.

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):
Applicants to ECB positions

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):
 - Position and employment (e.g. ECB positions you applied for)
 - Compensation (e.g. the salary bands of the ECB positions that you applied for)
 - Other information provided during the recruitment process (e.g. answers to screening questions)

(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 (*i.e. data on health and/or disabilities for specific campaigns*).
- ☐ 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):
Data may be shared with relevant (external) authorities in case of legal obligations.

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

- Your candidate profile (including disability-related medical information that may be requested in the context of specific campaigns restricted to persons with disabilities) will be stored for a maximum of two years (from the creation or last update of your profile or from the communication by us of the final outcome of your application) before being deleted.
- Your application and assessment data will be stored for a maximum of two years from the closure of the selection procedure before being deleted.
- If you have been placed on an ECB reserve list, some personal data will be stored on it for a maximum of 2 years from the approval of the selection procedure (for traineeships, from the closing date of the application timeframe) before being deleted.
- Referral data sent to us by one of our professional search companies will be deleted after the closing date for applications if you do not apply for the job that you were referred to or if you ask for the referral record.

You can find the full retention ECB plan here:

https://www.ecb.europa.eu/ecb/access_to_documents/shared/pdf/filing_retention_plan.sl.pdf