

11/12/2025

ECB-PUBLIC
UPDATABLE

RECORD OF PROCESSING ACTIVITY

CASPER project

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: DG-Statistics, Statistical Applications & Tools Division

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 ECB is the controller for the processing of the personal data. The Directorate General Statistics and the Directorate General Information Systems are responsible for the processing.
- ☒ The data is processed by a third party (contractor) or the processing activity is conducted together with an external third party: the data is processed by Amazon Web Services EMEA SARL, as sub processor for the ECB and by OneWelcome (ECB Identity Portal), as well as by Myra Security GmbH.
For further information please read:
 - <https://aws.amazon.com/privacy/>
 - <https://www.onewelcome.com/privacy-policy>
 - <https://www.myrasecurity.com/en/gdpr-compliance/>

3. Purpose of the processing

The centralised submission platform (CASPER) allows external organisations and partners to securely submit data to the ECB. Personal data are processed for the authentication and identification of the users. Personal information is mandatory requirement in order to create accounts for users to access the platform and authenticate securely. The personal information is collected via the authentication systems IAM (ESCB users) or ECB Identity Portal (externals). This data is

automatically synchronised between IAM or ECB Identity Portal and CASPER in order to allow the basic functionalities of the system (provide access to different data collections and ensure traceability of the access to each data collection and reporting entity).

Personal data are also processed for maintenance, performance, and security purposes. Some information are relevant for the technical security of our application. Myra Security GmbH, a German technology manufacturer providing a Security-as-a-Service platform, is responsible for processing limited categories of personal data (e.g., IP addresses). This processing is crucial for ensuring the technical security of our application. More detailed information on Myra Security GmbH's privacy policy can be found on [Myra Security GmbH's website](#).

4. Description of the categories of data subjects

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): Reporting Agents who submit / monitor data in CASPER

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): IP, HTTP headers, Cookies, Query Parameters and Payload Data, Device and Network Information

(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
- ☐ Information regarding an individual'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): CASPER user administrators from external organisations (i.e private companies/banks, universities)

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

Data are transferred to third country recipients:

- ☒ 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

In CASPER the personal data (name and email address) will be kept in the CASPER database and audit logs in accordance to the retention period defined in IAM and the ECB Identity Portal and to the retention period that the ECB collection owner will set for each data collection separately. Once the record is removed from the ECB Identity Portal /IAM the data will be removed from the user management in CASPER. The audit logs in CASPER will be deleted either based on the retention period that the ECB collection owner will set up or upon data subjects' request at any point.