

RECORD OF PROCESSING ACTIVITY

TRAVEL AND SECURITY CARE SERVICES

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: *Directorate-General Corporate Services / Directorate Administration / Division Security and Safety / Security Risk Management and Governance Section*

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 Corporate Services/ Directorate Administration/ Security and Safety Division / Security Risk Management and Governance Section.

- ☒ The data is also processed by the external company Falck Global Assistance (assistance provider)/Safeture (technical provider) providing travel and security care services. You can find more information about the data protection policies under the following links:

Falck Global Assistance: <https://www.falck.com/data-protection>, and

Safeture: <https://www.safeture.com/termsofservice/>.

3. Purpose of the processing

The personal data related to ECB business travels is collected and processed solely to mitigate security and medical risks: before the trip by preparing the ECB business travellers and during the trip to be able to respond to incidents. The travel details are required to determine the destinations of ECB business travellers on specific dates. Contact details are required to send pre-trip and special advance information to the business travellers and to contact them in case of incidents.

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): *relatives of the data subject if officially approved as an accompanying person of the data subject for the business travel*

5. Description of the categories of personal data processed

(a) General personal data:

The personal data contains:

☒ Personal details (*name of the business traveller, ECB e-mail address, ECB phone number, ECB mobile phone number. In case no ECB business contact details are available, the traveller will be required to provide an email address and a telephone number for contact*).

☐ Education & Training details

☐ Employment details

☐ Financial details

☐ Family, lifestyle and social circumstances

☐ Goods or services provided

☒ Other (please give details):

Pre-trip and Special Advance Information Services

Travel details: date and time of travel, destination of travel, booking date.

These data are transferred by the ECB's travel agency to the contractor.

Medical and Security Assistance Services:

Voice call recording.

Consent for sharing information related to a travel incident, excluding Medical Information, with ECB so the ECB can fulfil its duty of care

Location data, is an optional feature offered by the Service provider, that is collected via the app under full control of the ECB traveller (app user) when selecting this option.

(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

- ☒ ***Medical Services:** Consent is the Legal Basis for the processing of personal data (including medical data) by the processor. Medical data is not shared with the ECB.*

- ☐ 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): Staff of Falck Global Assistance/Safeture will have access to the information on a need-to-know basis and to perform the services and their sub-contractors as indicated in Falck Global Assistance' Privacy

Notice available at <https://www.falck.com/data-protection>, and Safeture' Privacy Notice and Data Protection Measures available at: <https://www.safeture.com/termsofservice/> and <https://www.safeture.com/data-protection-measures>.

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

Refer to [ECB's Filing and Retention Plan](#)

Personal data related to travel details and advice, are stored and processed by Falck Global Assistance/Safeture in the performance of their services without being necessary to be stored for a period longer than eighteen (18) months.

Personal data for individual cases related to medical and security assistance and travel security incidents is necessary for the continuous provision of the Falck Global Assistance/Safeture Services will be stored by Falck Global Assistance/Safeture for the contract period and up to eighteen (18) months after the expiry of the contract.