



RECORD OF PROCESSING ACTIVITY

Customer Relationship Management (CRM)
tool processing activity-based information, including related personal data

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Processor: [Adito GmbH](#), Germany

Organisational units responsible for the processing activities:

- various Directorates General

Data Protection Officer (DPO): DPO@ecb.europa.eu

2. Who is actually conducting the processing activity?

- ☒ The processing operation is conducted together with an external third party providing the CRM, [Adito GmbH, Germany](#)

3. Purpose of the processing

To increase efficiency and limit duplication of work across ECB business areas and units by managing activity data in a technically structured and consolidated data pool. This increases accountability towards ECB counterparts, produces activity reports, and allows meaningful and EU GDPR compliant management of personal data. To achieve this objective the ECB uses a CRM where activities (see above) are centrally managed by a range of departments and teams across the ECB. Centralised workflows and processes

ensure that details pertaining to external and internal contact parties are maintained in a safe environment.

The ECB business teams listed above control the data processed, supported by ECB Information Systems and the external CRM environment of Adito GmbH, Germany.

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 (company association, if applicable, and position title)
- ☐ Financial details

- ☐ Family, lifestyle and social circumstances
- ☐ Goods or services provided
- ☒ Other (please give details): Related activity data e.g. enquiries and requests, interview requests, speaking invitations, conference participation, visits to ECB, newsletter subscriptions, and related phone calls and email correspondence

(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):

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](#)

For reporting purposes, the CRM maintains activity data for 5 years. For visits to the ECB and conference participation, data is maintained until the event has been conducted.