

## RECORD OF PROCESSING ACTIVITY

### VIP TRANSFERS

#### 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](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 Corporate Services/ Directorate Administration/  
Security and Safety Division / Security Risk Management and  
Governance Section.*

- The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party providing chauffeur services.

### 3. Purpose of the processing

SET provides the service of VIP transportation based on business needs and to/ from ECB events. Personal data is processed to ensure proper transfers of the VIP attendees (e.g. name, professional details, accommodation details).

### 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): ECB's Executive Board members, Chair of the Supervisory Board, ECB representatives to the Supervisory Board, VIP guests; partners of VIP guests

### 5. Description of the categories of personal data processed

(a) General personal data:

The personal data contains:

- Personal details (name, organization, e-mail)
- Education & Training details (chauffeurs' safety trainings)
- Employment details (date of duration of the contract of the external driver with the respective company, contractual relationship between external driver and processor)
- Financial details
- Family, lifestyle and social circumstances (partners and spouses names)
- Goods or services provided
- Other (please give details): VIPs travel information (*incl. accommodation details*); external service provider (*drivers' names, phone numbers, cars' licence plates*)

**(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): External chauffeur service provider, security external service provider, passengers and passengers' offices

**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](#)

Data in ECB Systems retention period: End of calendar year + 5Y retention period (class code 1.3.2.2 and 1.3.3.2)

Data in processor systems' retention period: All data remains anonymised in the processor systems until the end of the contract with the ECB, therein all data is deleted.

Hardcopy documents of events are destroyed two days after the end of the event.