EUROPEAN CENTRAL BANK

EUROSYSTEM

RECORD OF PROCESSING ACTIVITY

NAME OF PROCESSING ACTIVITY

Corporate Telephone Survey and Non-Financial Business Sector Dialogue

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: DG-E / BCA

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 Economics – Business Cycle Analysis Division

☐ 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

3. Purpose of the processing

Details of business contacts at non-financial organisations participating in our Corporate Telephone Survey (CTS) are collected and stored solely for survey administration

purposes. The CTS has been designed for the collection and analysis of business sector views on economic events in order to complement and anticipate information from conventional statistical sources, and to provide an interpretation thereof. The Non-Financial Business Sector Dialogue (NFBD) takes place at least once a year in the form of a meeting between the ECB's Governing Council and the CEOs/Chairs of those companies participating in the CTS.

We require personal data to be able to contact organisations, schedule interviews and send general invitations so that companies can participate in the CTS. We also require personal data, as part of the authentication process, to verify participants' identity when using virtual meeting software for interviews and our web survey tool for occasional special surveys.

Our use of AI-based systems for transcribing and summarising interviews is intended to enhance the quality, clarity and comprehensiveness of interview summaries, ensuring they serve as a reliable record of discussions. The use of these systems also enhances efficiency and consistency of the drafting process while adhering to strict proportionality and compliance safeguards. No personal data will be used to build profiles, nor will such data be stored in dedicated AI-specific datasets.

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):
CEOs/Chairs/CFOs/contact persons (and their assistants) of large non-financial organisations operating in the euro area and covered by the CTS

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): any personal data shared by survey contacts during transcribed meetings (if explicit consent for transcription was given)

(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

The survey contact(s) and their assistants are stored for as long as the company participates in the CTS or until there is a change in the incumbent holding the position of the data subject, such as the CEO/Chair. In this respect, the participating organisations are invited to inform the ECB of any changes to the personal data previously provided.

Personal data stored in our Epsilon server are deleted within 1 month of the survey closing. Data are stored in the ECB internal repository for a maximum of 15 years (in accordance with Classification 7.3.2.1 of ECB's Filing and Retention Plan) and in Outlook for 10 years.