EUROPEAN CENTRAL BANK

EUROSYSTEM

RECORD OF PROCESSING ACTIVITY

Career Transition Support (CTS) scheme

1. Controller(s) of data processing activities

Controller(s): European Central Bank (ECB)

Organisational unit responsible for the processing activity:

Directorate General Human Resources / People Services Division (DG-HR / PSE)

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

2. Who determines the purposes and means of the processing of personal data?

☒ The data are processed by the ECB itself.

The organisational unit conducting the processing activity is:
Directorate General Human Resources, People Services Division

☐ The data are processed either solely by or together with an external third party (contractor).

Name of external third party and link to privacy statement if available

3. Purpose of the processing

The Career Transition Support scheme supports voluntary transition to a career outside the ECB of members of staff, based on a decision of the ECB Executive Board.

4. Description of the categories of data subjects

Whose personal data are being processed?

- ☒ ECB staff
- ☐ Externals (agency staff, consultants, trainees or secondees)
- ☐ Counterparts at either a national central bank (NCB) belonging to the European System of Central Banks (ESCB) a national competent authority (NCA) of a Member State participating in the Single Supervisory Mechanism (SSM)
- ☐ Visitors to the ECB, including conference participants and speakers
- ☐ Contractors providing goods or services
- ☐ Complainants, correspondents and enquirers
- ☒ Relatives of the data subject (e.g. in case of child allowance)
- ☐ 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 and training details
- ☒ Employment details
- ☒ Financial details
- ☒ Family, lifestyle and social circumstances (e.g. in case of child allowance)
- ☐ Goods or services provided
- ☒ Other (please specify):

The processed personal data include information available in ISIS such as the start date at the ECB (on fixed-term convertible or indefinite contract), start date in the current salary band, job title, BA/Division/Section, ASBR points in the last three years, age, salary band, step in band.

(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

☐ Other (please specify):

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 staff members at either a national central bank (NCB) belonging to the European System of Central Banks (ESCB) or a national competent

authority (NCA) of a Member State participating in the Single Supervisory Mechanism (SSM)

☒ Other (please specify):

The recipients of the data are the dedicated staff in DG-HR dealing with the request, and the managers involved in the decision making, namely, the respective Area Heads, the Chief Services Officer and the Executive Board members.

7. Transfers of personal data to / access from a third country 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 (SCCs);

☐ Binding Corporate Rules (BCRs);

☐ Administrative arrangement incorporating enforceable and effective data subject rights.

If the third country's legislation and/or practices impinge on the effectiveness of the appropriate safeguards, the personal data can only be transferred to, accessed from or processed in said third country if sufficient supplementary measures are taken to ensure an essentially equivalent level of protection to that guaranteed within the European Economic Area. 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 data will be kept until all obligations related to staff participation in the CTS programme have been fulfilled and the applicable payback period (of received benefits) has expired, i.e. until 31/10/2033 (Article 7.2 of Annex V of the ECB Staff Rules).

For data of individual staff members held in their digital personal file, the retention period is 10 years after all rights of the staff member and/or dependants are expired (series 3.0.1.1, 3.0.2.1, 3.10.1.1 of the ECB Retention Plan).