

## RECORD OF PROCESSING ACTIVITY

Random draw for establishing the Election Committee for elected committees (R-tool)

### 1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: *Directorate General Human Resources, Staff Relations Team*

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 Human Resources, Business Partnering Division, Staff Relations Team, and Employee Services Division, HR Analytics Team<sup>1</sup>*

☐ 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 if available

<sup>1</sup> Until the 1st of March 2026, later the HR Digitalisation and Employee Relations Division will be responsible.

### 3. Purpose of the processing

An automated tool ("R-tool") has been developed to carry out the random draw for establishing the Election Committee for elected committees as foreseen in the Administrative Circular 1/2025 amending Administrative Circular 1/2019. The draw should ensure diversity criteria as regards nationality, salary band, business area and gender among the Election Committee members.

### 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 *(in particular business area and salary band)*

☐ Financial details

Family, lifestyle and social circumstances *(Regarding the processing of absence data no sensitive data is disclosed during the exclusion procedure in creating the eligible pool. Certain categories of data subjects are excluded due to absences,*

☒ *however this is done generally, for different types of absences. Due to this, it is nowhere disclosed or separately processed, which concrete data subjects would be excluded on the grounds of sensitive personal data (such as medical data). Absence-related data is used only as a binary eligibility criterion and is not individualized. Such data are not stored, visualised, or disclosed as part of the outputs of the tool.)*

☐ Goods or services provided

☒ Other (please give details): *nationality, gender, information on potential conflicts of interest*

#### **(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 *(Regarding the processing of absence data no*

☒ *sensitive data is disclosed during the exclusion procedure in creating the eligible pool. Certain categories of data subjects are excluded due to absences, however this is done generally, for different types of absences. Due to this, it is nowhere disclosed or separately processed, which concrete data subjects would be excluded on the*

*grounds of sensitive personal data (such as medical data). Absence-related data is used only as a binary eligibility criterion and is not individualized. Such data are not stored, visualised, or disclosed as part of the outputs of the tool.)*

- ☐ 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 (*managers of the seven appointed Election Committee members will be informed only of appointed Election Committee member if employed in their respective business unit*)
- ☒ Designated ECB staff members (*of the Staff Relations and Analytics Team conducting the processing, they will only have access to the names of prospective members of the Election Committee*)
- ☐ Designated NCB or NCA staff members in the ESCB or SSM context
- ☒ Other (please specify):
- Chief Services Officer (only access to personal data, i.e. the names, of prospective members of Election Committee for the purpose of appointment or granting exemptions);*
- Members of the Staff Committee and Oversight Committee who will be invited to attend the random draw according to Administrative Circular 1/2025 amending Administrative Circular 1/2019 (only access to personal data, i.e. the names of prospective members of Election Committee);*
- A staff member of the Institutional Law Division, who will attend the draw;*
- All ECB and non-ECB staff (will be informed via intranet announcement only of appointed Election Committee members)*

## 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

Personal data pertaining to the results of the draw for establishing the Election Committee for elected committees Election Committee members will be stored permanently (in analogy to series 3.8.1.1 of the [ECB-wide filing and retention plan](#)).

Other personal data processed in the context of the draw such as preliminary results or

correspondence on eligibility criteria and exemptions will be deleted once the time limit for lodging an appeal against the election itself has expired and no appeal has been lodged.