

## RECORD OF PROCESSING ACTIVITY

Surveys on transfer of pension rights accrued by ECB staff  
(various EU countries)

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

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: *Directorate General Human Resources, People Services Division, Pension & Insurance Team as creator of the survey form in Microsoft (MS) Forms*

*Directorate General Information Systems as contract manager for Microsoft products*

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, People Services Division,  
Pension & Insurance Team as creator of the survey form*

*Directorate General Information Systems as contract manager for Microsoft products*

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

*The surveys are conducted via MS Forms, a product provided by Microsoft.*

*The data collected via the surveys is shared with a very limited number of staff*

*members from the respective pension authority.*

Link to privacy statement if available

### 3. Purpose of the processing

The ECB is engaging in discussions with pension authorities of various countries to conclude agreements regarding the transfer of pension rights accrued by ECB staff members under previous national schemes. In this context, surveys are conducted amongst eligible colleagues to collect information on the interest in such a transfer. Participation in the surveys is voluntary. The collected data will be shared with the respective pension authority to evaluate the financial impact and estimate the potential costs related to transferring pension entitlements.

### 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) – *names, email addresses and nationality of eligible staff members to whom the survey is sent to are extracted from ISIS*
- Education & Training details
- Employment details
- Financial details
- Family, lifestyle and social circumstances
- Goods or services provided
- Other (please give details): *social security number, tax code or any other unique identifier, depending on the respective national pension system (only this identifier will be shared with the national pension authority); IP addresses and associated metadata in MS Forms (only for technical purposes)*

**(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): *a very limited number of staff members from the respective pension authority; Microsoft and its sub-processors as well as other external service providers (only access to technical data, not to survey responses)*

**7. Transfers to/Access from third countries or an international organisation**

Data are processed by third country entities:

- Yes

Specify to which countries: *only in exceptional cases, processing may occur in countries for which an Adequacy Decision of the Commission exists, please see this general [privacy statement](#) on MS Forms*

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

*1 year after the pension transfer agreement with the respective pension authority is concluded.*