

RECORD OF PROCESSING ACTIVITY

Breach Reporting / Whistleblowing Mechanism

1. Controller(s) of data processing operation

Controller: *European Central Bank (ECB)*

Organisational unit responsible for the processing activity: *Directorate General SSM Governance and Operations, Division Enforcement and Sanctions*

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

2. Who is actually conducting the processing?

- ☒ The data is processed by the ECB itself

The organisational unit conducting the processing activity is:
Directorate General Secretariat to the Supervisory Board, Division Enforcement and Sanctions

This record of processing activity also covers the processing of personal data carried out through Athena, an AI-powered tool that summarises, translates, and analyses documents. Athena collects, transmits, and indexes information (including personal data) to support SSM business areas in efficiently identifying relevant information for their supervisory responsibilities. Fully integrated into the ECB's information management systems, Athena provides advanced search, Natural Language Processing (NLP) and AI capabilities.

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

The submitted information is processed on behalf of the ECB by the external provider EQS Group AG. For more information please read the [EQS privacy policy](#).

The ECB may also involve third party processors in the context of potential translations.

3. Purpose of the processing

The ECB has developed its breach reporting/whistleblowing mechanism for use by anyone who, acting in good faith, has reasonable grounds to believe that a supervised entity or competent authority has breached the legal acts referred to in Article 4(3) of [Council Regulation \(EU\) No 1024/2013](#) (the SSM Regulation) and wishes to submit relevant information to the ECB.

4. Description of the categories of data subjects

- ☒ ECB staff members
- ☒ Non-ECB staff members (agency staff, consultants, cost-free trainees or cost-free secondees working at the ECB)
- ☒ National Central Bank (NCB) or national competent authority (NCA) counterparts (in the ESCB or SSM context)
- ☒ Other (please specify):
 - 1) *Persons who have provided information to the ECB (informants);*
 - 2) *Persons suspected of breaching/having breached relevant Union law (accused persons);*
 - 3) *Persons who may be involved in or are affected by the procedure and who are named in the information provided by the informant (persons involved);*
 - 4) *Persons who may be able to provide further information on the reported matter (witnesses);*
 - 5) *Other persons who may appear in the information provided or the ECB case file but have no relevance to the case (other persons).*

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
- ☒ Other (please give details): *The categories of personal data that may be processed relate to the content of the allegations, earlier contacts with NCAs/NCBs, persons responsible for the alleged breach, information on where/how to find additional evidence etc. To this end, the ECB provides a web form collecting information, including free text fields.*

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

- ☒ Designated ECB staff members
- ☒ Designated NCB or NCA staff members in the ESCB or SSM context

7. Transfers to third countries or an international organisation

Data are transferred to third country or an international organisation recipients:

- ☒ Yes

The ECB is party to various cooperation agreements and will continue to enter into arrangements of this type with other authorities or international organisations, which could then request personal data from breach reporting /

whistleblowing case files. In such cases, the ECB is required to comply with specific rules on the transfer of personal data to recipients located in non-EU countries, where EU data protection law does not apply. These rules are set out in Chapter V of the Data Protection Regulation.

8. Retention time

After a case file has been closed, all relevant personal data will be stored for a set retention period. If a report received by the ECB is considered relevant to the ECB's supervisory tasks, the data will be stored for fifteen years. If a report is not considered relevant to the ECB's supervisory tasks but concerns the ECB's other tasks, the data will be stored for three months. If the ECB decides that a report is not relevant to any of its tasks, the data will be stored for three months.