



RECORD OF PROCESSING ACTIVITY

Securities Financing Transactions Data Store (SFTDS) project

1. Controller(s) of data processing activities

Controllers: European Central Bank (ECB), Nationale Bank van België/ Banque Nationale de Belgique, Deutsche Bundesbank, Banque de France, Banca d'Italia, Banco de España, De Nederlandsche Bank, Banque Centrale du Luxembourg. A memorandum of understanding on joint controllership for the processing of personal data in the context of the SFTDS project has been signed by these parties.

Organisational unit responsible for the processing activity: ECB DG/MF

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: DG/MF
- The data is processed by a third party (contractor) or the processing activity is conducted together with an external third party
Contact point at external third party (e.g. Privacy/Data Protection Officer):

The data is also processed by seven SFTDS member national central banks (NCBs) (Nationale Bank van België/Banque Nationale de Belgique, Deutsche Bundesbank, Banco de España, Banque de France, Banca d'Italia, Banque Centrale du Luxembourg and De Nederlandsche Bank). A memorandum of understanding has been signed between these parties, in the light of the joint controllership, governing the relevant responsibilities in the context of processing personal data and corresponding requests.

3. Purpose of the processing

The SFTDS project implements a single Securities Financing Transactions (SFT) data store which is expected to deliver important benefits for the ECB and the Eurosystem. In particular,

the SFTDS would enhance capabilities for market finance monitoring and financial stability analysis. The SFTDS is being undertaken as an ECB project, in close cooperation with seven euro area NCBs.

While the occurrence of personal data in individual SFTs is highly unlikely, the possibility that the data store may contain personal data cannot be fully excluded. SFTs are typically conducted by financial corporations and to a lesser degree by non-financial corporations. However, there is a possibility that an individual person might conduct an SFT, as indicated in Regulation (EU) 2015/2365 (SFT Regulation); see Article 3(5)(a) explicitly referring to “natural persons”. Whereas corporations should be identified by a legal entity identifier (LEI), they could in exceptional cases be reported under a bank identifier code (BIC) or client ID. In the case of a natural person, a client ID should be used for identification. The field is technically free-form and may be filled with up to 50 alpha numeric characters. In the highly unlikely case that a natural person’s name were to be reported directly or a code were to be used that allowed a person to be identified, this information would be included in SFTDS. The data store will receive and retain all the granular raw data contained in the files compiled by trade repositories and may therefore contain such personal information.

4. Description of the categories of data subjects

- 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 service
- Complainants, correspondents and enquirers
- Relatives of the data subject
- Other (please specify): Securities Financing Transactions market participants (mostly financial and some non-financial corporations) in case of being a natural person and only if the person’s name is clearly identifiable from the client ID reported.

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):

(b) Special categories of personal data (Article 10)

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
- Information regarding an individual'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 third countries or an international organisation

Data are transferred to third country recipients:

Yes

Specify to which country:

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

Any personal data that may appear in SFTDS would be reported through the client ID. The corresponding field will be subject to a five-year retention period, after which it will be properly anonymised or deleted. A retention period of five years will allow for producing proper time series of the available data, e.g. for the purpose of regression analysis or to identify how financial networks evolve over time.