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ECB-PUBLIC

UPDATABLE

RECORD OF PROCESSING ACTIVITY

Recording, storing and listening of telephone conversations in DG-M and DG-MIP

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Contact details:

European Central Bank

Sonnemannstrasse 22

60314 Frankfurt am Main

Germany

E-mail: info@ecb.europa.eu

Organisational unit responsible for the processing activity:

- Directorate General Market Infrastructure & Payments (DG-MIP)
- Directorate General Market Operations DG-M [Money Market & Liquidity Division (MML); Bond Markets & International Operations Division (BMI); Financial Operations Services Division (FOS)]

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 units conducting the processing activity are: DG-MIP and DG-M [Money Market & Liquidity Division (MML); Bond Markets & International Operations Division (BMI); Financial Operations Services Division (FOS)]

3. Purpose of the processing

Telephone conversations may only be recorded and listened to within DG-M in order to:

- clarify the terms of a transaction or of any other communication made to market counterparties on behalf of the ECB; or
- ensure that inside information regarding the European System of Central Banks (ESCB) is safeguarded; or
- identify violations of professional secrecy or the misuse of inside information;

Within DG-MIP, the T2S Crisis Managers' conference calls are mandatorily voice recorded for the purpose of ex-post debriefing/ communication/ or possible audit and all decisions shall be summarised as well in writing. For further details, please read the [EDPS Prior Checking Opinion](#).

4. Description of the categories of data subjects

- ☒ ECB employee(s)
- ☒ Externals (agency staff, consultants, trainees or secondees)
- ☒ NCB or NCA counterparts (in the ESCB or SSM context)
- ☒ Contractors providing goods or services
- ☒ Other (please specify): *CSDs*

5. Description of the categories of personal data processed

(a) General personal data:

The personal data contains:

- ☒ Employment details
- ☒ Other (please give details): *voice recordings*

6. The categories or recipients to whom the personal data have been or will be disclosed, including the recipient(s) of the data in Member States, third countries or international organisations

- ☒ Data subjects themselves
- ☒ Managers of data subjects
- ☒ Designated ECB staff members

7. Retention time

- Telephone conversations in DG/M are stored for a period of 92 days and will automatically be deleted thereafter. Recordings relating to a disputed transaction or required for administrative, disciplinary or criminal follow-up are retained until the dispute has been resolved or follow-up completed. Within DG-MIP, T2S Crisis Managers' conference calls are stored for a period of 10 years in the ECB's central storage area and will be deleted thereafter.