

RECORD OF PROCESSING ACTIVITY

Personal data in Information Management for Supervision (IMAS)

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: DG-SGO, Technology and Innovation Division, Core Systems Section 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-SGO, Technology and Innovation Division, Core Systems Section

☒ The data is processed by a third party (contractor) or the processing operation is conducted together with external third parties Microsoft and AWS

3. Purpose of the processing

The system Information Management of Supervision (IMAS) captures some personal data with the scope of tracking the status of supervisory processes and assigned responsibilities. Some of those functionalities are linked to a specific module, while others are horizontal.

In addition, the system processes personal data when reconciling the access rights of

users.

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)
- ☒ Other (please specify): supervised entities' staff and shareholders, customers of the supervised entities and collateral appraisers.

5. Description of the categories of personal data processed

- ☒ Personal details (name, address etc)
- ☒ Employment details

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

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

The overall retention of the system should be 5 years after the end of system/database life, but shorter retention periods apply for specific processes.