



RECORD OF PROCESSING ACTIVITY

IMAS PORTAL

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: Directorate General
Supervisory Governance and Operations

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: SSM
Governance and Operations/ Technology and Innovation Division /
Core-Systems
- ☒ The data is processed by a third party (contractor) or the processing operation is
conducted together with an external third party AWS
- Link to privacy statement if available

3. Purpose of the processing

The main processing activity in the IMAS portal (SSM information management system portal) is to collect the contents of supervisory applications and submissions. All data contained in supervisory applications/submissions are collected and then submitted by users of the IMAS portal (i.e. authorised staff in the entities that use the IMAS portal).

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): supervised entities' staff and shareholders, costumers of the supervised entities and collateral appraisers

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

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):

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 IMAS system/database life. In addition, after the process completion, all personal data associated with a particular process will be hidden from the IMAS portal and thus will become inaccessible to the users.