EUROPEAN CENTRAL BANK

EUROSYSTEM

ECB-PUBLIC

RECORD OF PROCESSING ACTIVITY

Audit Missions [1]

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: Directorate Internal Audit (D-IA)

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: D-IA

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

Under certain circumstances data may also be processed by a third party (contractor) or the activity may be conducted together with an external party, such as external auditors for the purpose of auditing the annual accounts of the ECB, external companies, such as consulting firms, for the purpose of providing support, e.g. with special IT knowledge, to the ECB's audit missions. A dedicated privacy statement for audit missions is available on the webpage of the ECB (see here: privacy statement).

[1] For administrative investigations please consult the ECB's website for the relevant Record of Processing Activities.

3. Purpose of the processing

Personal data is processed in the context of D-IA's internal audit services as defined by the Executive Board in the ECB Audit Charter. The processing aims to identify, assess, evaluate and record relevant information for assurance and advisory engagements. Any personal data that falls within the scope of these activities is collected from the ECB business areas. In general, D/IA processes only personal data which is relevant for a specific task.

D-IA may process personal data to fulfil in particular the following tasks:

- the implementation of the ECB's audit plan and Internal Auditors Committee (IAC) work programme by conducting and reporting on assurance and consultancy activities;
- assessing the implementation status of audit recommendations;
- processing of incident reports from ECB business areas (excluding incidents related to breaches of professional duties).

Furthermore D-IA processes data in order to provide audit support (e.g. as the secretariat to the IAC) and to coordinate external audit services (e.g. external auditors or European Court of Auditors).

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): dependents of the data subject, former employees and applicants, and personal data of any third party may be processed if such data is required to perform the specific audit mission in line with the ECB Audit Charter and/or the IAC Charter.

5. Description of the categories of personal data processed

Depending on the case, all or part of the below data may be processed in the context of an internal audit.

(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: D/IA may access all personnel, records, information, systems and property deemed necessary to carry out its responsibilities. In the course of the work, internal auditors process personal data (mostly by consultation and retrieval); information related to civil and/or administrative proceedings and/or any other regulatory investigations; information relating to criminal proceedings; a sanction and/or other administrative penalty; depending on the case, any other category of personal data may be processed.

(b) **Special categories of personal data**

Such data will only be processed **in duly justified cases**.

The personal data reveals:

- ☒ 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 (including secondees), where relevant in the context of IAC audit activities.

☒ Other: externals (consultants and external auditors or trainees) participating in internal audit activities; upon request, members of the ECB Executive Board, Governing Council, Supervisory Board and/or the ECB Chief Services Officer; when applicable, on a need to know basis and in compliance with the relevant legal framework, bodies charged with monitoring or inspection tasks in application of EU law, e.g. European Court of Auditors (ECA), European Anti-Fraud Office (OLAF), European Public Prosecutor's Office (EPPO) and competent national authorities, European Data Protection Supervisor (EDPS), Ethics Committee, Audit Committee (AC).

In the context of audit support and coordination of external audit services (e.g. ECA, AC) D-IA processes the information as processor.

7. Transfers to/Access from third countries or an international organisation

Data are transferred to third country recipients:

☐ 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 retention of D-IA's audit files is in line with the ECB's Filing and Retention plan.

Personal data that may have been processed during an audit mission are deleted or anonymised once the ECB's decision-making bodies have considered the audit report.

If such data are needed for follow-up and/or evidence purposes, they may be retained for up to two years starting from the date of the decision-making bodies decision. If the follow-up process exceeds two years, and/or the personal data are needed for any potential related actions, they may be retained for a longer period, in line with the general retention period for audit files. Information in audit reports is always anonymised.