

**Privacy Statement  
for the processing of personal data related to contract management**

**1. Data Protection legal framework applicable to the European Central Bank**

All personal data are processed in accordance with EU Data Protection Law<sup>1</sup>.

**2. The European Central Bank as controller of processing personal data**

The European Central Bank (ECB) is the controller of the processing of personal data related to contract management. The ECB business area/organisational unit in charge of contract conclusion/ management is responsible for that processing.

**3. Purpose of processing your personal data**

The ECB collects and processes personal data for contract awards and subsequent contract management.

**4. Lawfulness of the European Central Bank's data processing operations**

The processing of personal data for the aforementioned purposes is necessary within the meaning of Article 5(1) (a) and (c) of Regulation (EU) 2018/1725.

**5. Categories of personal data processed by the European Central Bank**

The following personal data related to contractors, their staff, their subcontractors and the subcontractor's staff (natural persons) may be processed:

- **identification data**, e.g. full name, ID/passport number;
- **position and function** in a company;
- **contact details**, e.g. e-mail address, business telephone number, mobile telephone number, fax number, postal address, company and department, country of residence, internet address;
- **financial data**, e.g. bank account (IBAN and BIC codes), VAT number;
- **information for the evaluation of selection or eligibility criteria**, e.g. expertise, technical skills, languages, educational background, professional experience including details on current and past employment.

**6. Access to personal data processed by the European Central Bank**

Access to personal data processed by the ECB in relation to contract management may be given to the following persons:

- ECB staff members involved in contract awards and subsequent contract management;
- dedicated ECB staff members providing opinions and advice in specific cases dealing with contract award and subsequent contract management;
- dedicated ECB staff dealing with appeal procedures;
- a limited number of staff of the ECB's Internal Audit function who are involved in audits or conduct specific inquiries related to contract awards and management may further process some of the personal data in line with their mandate;
- staff of the National Central Banks of the European System of Central Banks;
- external experts and contractors on behalf of the ECB for the purpose of managing the contract award and subsequent contract management;
- Union institutions and bodies charged with monitoring or inspection tasks in the application of Union law (e.g. the European Commission, internal auditors, the European Anti-Fraud Office).

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<sup>1</sup> Regulation (EU) [2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L 295, 21.11.2018, p. 39).

## **7. Protection of personal data**

Personal data are stored in the ECB's secure document management system. Signed physical contracts are held physically on the ECB's premises or in secure premises available to the ECB.

## **8. Retention periods of personal data**

Personal data are stored for **a maximum period of 10 years** following the end of the contract period.

In the event that administrative (e.g. appeal) or judicial proceedings are initiated, the **retention period ends two years after such proceedings are concluded by a final decision or 10 years following the end of the contract period**, whichever is longer. This further retention of data is considered necessary for the respective legal remedies.

Moreover, contracts concluded for the purposes of construction/ purchase of the ECB's buildings or acquisition of artworks, including personal data contained therein, are kept for an **unlimited period** in accordance with the ECB's retention policy. Data subjects may request the deletion of their personal data in the specific contract dossier. This request will be addressed in accordance with Section 9.

## **9. Your rights as a data subject**

You have the right to access your personal data and correct any data that is inaccurate or incomplete. You also have (with some limitations) the right to the following:

- to delete your personal data;
- to restrict or object to the processing of your personal data in line with the relevant provisions of Regulation (EU) 2018/1725.

## **10. Contact information in case of queries and requests**

You can exercise your rights by contacting the ECB Contract Manager indicated in the signed contract. For all queries relating to personal data, please contact the ECB's Data Protection Officer at [dpo@ecb.europa.eu](mailto:dpo@ecb.europa.eu).

## **11. Addressing the European Data Protection Supervisor**

You have the right to lodge a complaint with the [European Data Protection Supervisor](#) at any time if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data.

## **12. Changes to this Privacy Statement**

This Privacy Statement may be changed to take into account new legal developments.