

## RECORD OF PROCESSING ACTIVITY

ECB oversight competence in the SSM framework

### 1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: Directorate General  
Specialised Institutions & LSIs

Data Protection Officer (DPO): [DPO@ecb.europa.eu](mailto: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:

Directorate General Specialised Institutions & LSIs

### 3. Purpose of the processing

ECB might receive - as part of its oversight role - information that is processed by NCAs but ECB does not structurally collect and process personal data. Pursuant to Article 6(6) of the 'SSM Regulation' national competent authorities (NCAs) shall carry out and be responsible for the supervisory tasks referred to in points (b), (d) to (g) and (i) of Article 4(1) and for adopting corresponding supervisory decisions in relation to the prudential supervision of less significant credit institutions as defined in the first subparagraph of Article 6(4) of the SSM Regulation (hereinafter also referred to as 'credit institutions').

#### 4. Description of the categories of data subjects

- ☒ Non-ECB staff (agency staff, consultants, cost-free trainees or cost-free secondees working at the ECB)
- ☒ NCB or NCA counterparts (in the ESCB or SSM context)
- ☒ Relatives of the data subject
- ☒ Other (please specify): Less significant institutions' personnel, members of the management body, customers and their guarantors, shareholders and creditors (including their partners); service providers, consultants, external auditors; staff or representatives of banking associations; staff of other competent authorities; staff of other European or international institutions; other third parties (e.g. persons filing complaints or submitting inquiries regarding supervised entities).

#### 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

Other (please give details): involvement in alleged criminal activities (e.g. in the context of information received from the AML authorities); information on

- ☒ disciplinary actions, ongoing or concluded criminal or other types of judicial proceedings; nature of goods or services provided in the context of the assessment of an outsourcing arrangement.

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

The personal data reveals:

☒ Trade union membership

In the context of ongoing supervision, processing of sensitive data – as defined in Article 9 of Regulation (EU) 2016/679 and Regulation (EU) 2018/1725 – is not foreseen. However, these special categories of personal data might be accidentally found in the documentation received by the supervisory teams.

**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

☒ Designated ECB staff members

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

☒ Other (please specify):

EEA or third-country relevant authorities, administrations or international organisations (e.g. in the context of colleges of supervisors, or to exchange information for the purpose of performing the supervisory tasks of those authorities or bodies under an Memorandum of Understanding or an ad-hoc agreement); external experts and contractors working on behalf of the NCA or ECB providing opinions, advice and support in the context of the prudential supervision of credit institutions (e.g. legal counsels, translators, editors); representatives of the concerned Less Significant Institutions (representatives of each institution would be recipient of information relative to their own supervised institution, not from other institutions); staff members of other Union institutions, bodies and agencies, supervisory authorities and national authorities (e.g. Administrative Board of Review, European Court of Justice, public prosecutors or authorities tackling money laundering).

**7. Retention time**

In accordance with the ECB Filing and Retention Plan, most data related to the supervisory oversight functions are kept for a maximum of 15 years.