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UPDATABLE

RECORD OF PROCESSING ACTIVITY

SCANNING AND DIGITAL PROCESSING OF INCOMING BUSINESS MAIL

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: DG-CS / D-A/ ADS

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:
- The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party [GONDER Logistics GmbH]

Link to [privacy statement](#)

3. Purpose of the processing

For an EU institution like the European Central Bank (ECB) to function efficiently, it is necessary to scan mail and process it digitally. Performing tasks in the public interest requires adequate data processing of mail – in other words, scanning images of the exterior of business mail, and capturing images of the contents of the mail itself – in

order to facilitate efficient and punctual communication between the ECB, national central banks, national competent authorities, business counterparts and the public. By scanning and digitally distributing mail, we ensure secure and prompt delivery of communications, thereby supporting smooth business operations and timely decision-making.

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): Any third parties whose personal data is contained within the mail content, such as names, contact details, or other identifying details.

5. Description of the categories of personal data processed

(a) **General personal data:**

The personal data contains:

- Personal details (name, contact details)
- Education & Training details

- Employment details
- Financial details
- Family, lifestyle and social circumstances
- Goods or services provided
- Other (please give details): Office building and room number, business phone number

(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): External mail service provider as indicated above.

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

Personal data will be stored for a maximum of 90 days in the mail scanning process before being deleted.

Please note that personal data may be held by the ECB's archives in accordance with Decision (EU) 2023/1610 of the European Central Bank of 28 July 2023 establishing the historical archives of the European Central Bank.