

## RECORD OF PROCESSING ACTIVITY

### Audit support and missions<sup>1</sup>

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

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: European Central Bank (ECB) / Directorate Internal Audit (D/IA)

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: 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 be 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 and investigations or other activities detailed in the ECB Audit Charter.

A dedicated privacy statement is available on the webpage of the ECB.

<sup>1</sup> Regarding investigations/administrative inquiries please consult the ECB's register of data processing activities for a separate 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 consultancy activities. 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, cost-free trainees or cost-free secondees working at the ECB)
- 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, 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](#).

## 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, will or may 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)
- 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 third countries or an international organisation

Data are transferred to third country recipients:

- Yes
  - Adequacy Decision of the European Commission
  - Standard Contractual Clauses
  - Binding Corporate Rules
  - Memorandum of Understanding between public authorities
- No

## 8. Retention time

The personal data is stored for a maximum of 15 years related to audit missions, 10 years related to audit support work, 2 years related to audit checks and special investigations not related to inquiries from the date of termination of the activity and 10 years for audit annual reports from the end of the calendar year before being deleted unless the data is needed for a longer period of time for any potential follow-up actions, such as disciplinary or judicial proceedings.

As a rule, the information presented in audit reports is anonymised.