



## RECORD OF PROCESSING ACTIVITY

### Use of credit rating services in the context of procurement procedures

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

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity/organisational unit:

DG-Corporate Services / D-Finance / Central Procurement Office

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:

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

Link to privacy statement if available

#### 3. Purpose of the processing

In the context of conducting procurement procedures, the ECB is checking the financial soundness of the bidders. In this regard, the ECB consults credit rating reports provided by specialised companies in the sector.

**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):  
Individuals included in company's credit rating reports.

**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
- Goods or services provided

- Other (please give details): Financial information, credit ratings

**(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):

## 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

The Credit Rating reports containing the personal data are stored in Darwin folders related to procurements. In accordance with the [ECB's Filing and Retention Plan](#), the procurement folders have a retention period of 10 years.