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ECB-PUBLIC
UPDATABLE

RECORD OF PROCESSING ACTIVITY

Smart Analytics Project – SAP Analytics Cloud Solution

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: Directorate General Corporate Services / Directorate Finance – Budgeting and Controlling Division

Contact point¹: DG-CS.Digitalisation@ecb.europa.eu

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:

- Directorate General Corporate Services
- Dashboards will also be available for the other ECB Business Areas

The data is processed by SAP only when explicitly requested by an ECB internal administrator on a very exceptional basis, if at all. Privacy notice from SAP below, contact DG-IS/ENS for further questions.

Link to privacy statement: <https://www.sap.com/about/trust-center/data-privacy.html>

¹ Please provide a functional email account of the competent unit in case of questions.

3. Purpose of the processing

The aim is to report on financial and procurement data and not to report on personal data. In order to access the system, users will have their (i) names, (ii) usernames, and (iii) email addresses available in the system. Only ECB administrators will have access to this information, no third party (SAP) access will be granted. Other data such as supplier names will be reported as supplier number to the extent possible, to avoid that individual supplier names are mentioned in the reports.

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 (individual suppliers – however, supplier number will be used instead of name and colleagues will be instructed to do so)
- Complainants, correspondents and enquirers
- Relatives of the data subject
- Other (please specify):

5. Description of the categories of personal data processed**(a) General personal data:**

The personal data contains:

- Personal details (name, username, e-mail address – accessible by ECB administrators only)
- Education & Training details
- Employment details
- Financial details
- Family, lifestyle and social circumstances
- Goods or services provided
- Other (please give details):

(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 (ECB administrators in DG-IS and D-F)
- Designated NCB or NCA staff members in the ESCB or SSM context
- Other (please specify): SAP does not have access to the data, however, if requested by the ECB (via ECB administrators) they can troubleshoot on an exceptional basis on the reports and dashboards set up.

7. Transfers to third countries or an international organisation

Data are transferred to third country recipients:

- Yes

Specify to which country: EU (Germany) server from the start, EU access from mid-2022 (restricted usage prior to this).

Specify under which safeguards: SAP will not have access to our data as default, neither any other third party. Users' information will be managed by ECB administrator only, not SAP.

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

8. Retention time

Users have their accounts active in the system as long as they need access to the system, which could mean until the end of their ECB contracts. If they leave the ECB, move to another division or request the removal of the roles, the system access is removed.