# RECORD OF PROCESSING ACTIVITY

## ECB Information Management System ASTRA

| 1. Controller(s) of data processing activities |
| --- |
| Controller: European Central Bank (ECB) <br><br> Organisational unit responsible for the processing activity: <br><br> Directorate General Information Systems / Enterprise & Business Services <br><br> Data Protection Officer (DPO): DPO@ecb.europa.eu |

| 2. Who is actually conducting the processing activity? |
| --- |
| ☒ The data is processed by the ECB itself <br><br> The organisational unit conducting the processing activity is: <br><br> Directorate General Information Systems / Enterprise & Business Services <br><br><br> ☒ The data is processed by a third party (contractor) or the processing operation is conducted together with external third parties: OneWelcome, OpenText <br><br> Link to privacy statement if available: *OneWelcome privacy policy* / *OpenText privacy policy* |

## 3. Purpose of the processing

The personal data are processed for creation of user accounts for ASTRA which is the ECB's platform for external collaboration and document exchange (based on OpenText Core). In order to create accounts for the external users to access the platform and authenticate securely, personal information is a mandatory requirement. The personal data is collected by ECB staff for the purpose of creating user accounts in OneWelcome (system that provides access to multiple ECB externally facing applications). OneWelcome requires multifactor authentication by default, and therefore the full name, phone number and email address are required. This data, excluding the phone number, is automatically synchronised between OneWelcome and ASTRA, in order to allow the basic functionalities of the system (provide granular access to different areas of ASTRA and ensure traceability of the access to each document in line with DG-IS Security Policies).

## 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 external person accessing and exchanging in the document-centric collaboration platform that is ASTRA

## 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):

(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):

3UM service provider OneWelcome; ASTRA service Provider (OpenText)

| 7. | Transfers to/Access from third countries or an international organisation |
|----|---|

Data are processed by third country entities:

☒ Yes

Specify to which countries:

The data remains in EU data centres but can be accessed by employees of OpenText – Canadian company subject to the Personal Information Protection and Electronic Documents Act.

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

☐ No

| 8. Retention time |
|---|
| The personal data will be stored in the designated ECB staff members' mailboxes for max 1 year after receipt, in OneWelcome for as long as the user is actively collaborating with the ECB and will be deleted within 12 months after the user becomes inactive. In ASTRA, the personal data (name and email address) will be kept in the audit log until the documents are deleted manually or, at the latest, in accordance with the retention period applicable to the document under the ECB Filing and Retention Plan. |