



RECORD OF PROCESSING ACTIVITY

Insight Engine for the SSM (Project Athena)

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: DG-IS / PRS

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 Information Systems / Prudential Domain Services

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

<https://squirro.com/privacy-policy/>

<https://learn.microsoft.com/en-us/legal/cognitive-services/openai/data-privacy/>

3. Purpose of the processing

The application serves as a search engine to support human decision-making on institutions in terms of the SSM processes. To that extent, it only processes structured and unstructured data, containing e.g. news, guidelines, policies, ICAAP/ILAAP reports and SREP narratives, which are originally stored and maintained in other ECB / SSM services such as DARWIN, IDRA and DEVO. Its main purpose is to analyse financial institutions with respect to the different SREP categories: business model, governance and risk management, risks to capital and risk to

liquidity and funding.

Project ATHENA only indexes (it processes documents, applies models (not targeting personal data) to generate some information, like document sentiment, and stores that information to then be searchable by the end-user) information to enable its functionality. Some additional services, such as Optical character recognition (OCR) and document translation, are used to support the quality of the indexing process. Personal data is not in the focus of Project ATHENA, however, in rare cases personal data could potentially be contained in documents provided by financial institutions.

| 4. Description of the categories of data subjects | |
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| <i>Whose personal data are being processed?</i> | |
| <input checked="" type="checkbox"/> ECB staff <input checked="" type="checkbox"/> Externals (agency staff, consultants, trainees or secondees) <input checked="" type="checkbox"/> NCB or NCA counterparts (in the ESCB or SSM context) <input type="checkbox"/> Visitors to the ECB, including conference participants and speakers <input type="checkbox"/> Contractors providing goods or services <input type="checkbox"/> Complainants, correspondents and enquirers <input type="checkbox"/> Relatives of the data subject <input checked="" type="checkbox"/> Other (please specify): authors of articles, personal information from supervised entities and staff working in the supervised entities. | |

| 5. Description of the categories of personal data processed | |
|---|--|
| <p>(a) General personal data: The personal data contains:</p> | |

- 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

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|---|
| <input checked="" type="checkbox"/> Designated ECB staff members <input checked="" type="checkbox"/> Designated NCB or NCA staff members in the ESCB or SSM context <input checked="" type="checkbox"/> Other (please specify): Staff members of the vendor (Squirro) |
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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

Athena's index may contain personal data. However, ATHENA does not have a document repository of its own. All documents are stored in external services, DARWIN and DEVO, and only the indexes are stored by ATHENA. As a result of this approach, if something gets deleted from the external services, the indexes are also deleted.

Microsoft does not retain the data sent to them and after processing it is deleted.