



RECORD OF PROCESSING ACTIVITY

Processing of personal data in translation memories and project folders

1. Controller(s) of data processing activities

Controller: European Central Bank

Organisational unit responsible for the processing activity:

Directorate General Legal Services - Legislation Division (DG-L/LEG)

Directorate General Communications - Language Services Division (DG-C/LGS)

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:
DG-C/LGS and DG-L/LEG
- The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party

3. Purpose of the processing

Software-assisted translation

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): natural persons in connection with the supervised credit institutions

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):criminal records

(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): external contractors using tokens

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

Data are processed by third country entities:

Yes

Specify to which countries: countries outside the EEA, in particular the United Kingdom

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 username of the translator/lawyer-linguist is linked to the text in the translation memory, which is maintained permanently, or as long as needed plus 5 years. It can also be anonymised upon request of the translator/lawyer-linguist.

Translation software-related projects are retained for 5 years after the end of the calendar year during which they have been created.