

24/02/2025 (DATE OF PUBLICATION/LAST UPDATE)

ECB-PUBLIC  
UPDATABLE

**RECORD OF PROCESSING ACTIVITY**  
**MANAGEMENT OF ECB ART ACTIVITIES**

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

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: Directorate General Corporate Services - Administration/ Premises Division, Corporate Real Estate Management, Art Project 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: Directorate General Corporate Services - Administration/ Premises/ Corporate Real Estate Management, Art Project Office

**3. Purpose of the processing**

In the context of the ECB's art activities, personal data are processed to support:

- Relations with National Central Banks (NCBs) or National Competent Authorities (NCAs)
- Relations with other external parties, e.g. artists or galleries
- Procurement and accounting activities
- Maintenance of a contact data base
- Auditing purposes

**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
- 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, 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 or recipients to whom the personal data have been or will be disclosed, including the recipient(s) 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: 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 personal data is kept for as long as the asset (art work) is kept by the ECB, or loaned-out artworks have not been returned to the ECB.