RECORD OF PROCESSING ACTIVITY
Tender Operations Platform (TOP)

1. Controller(s) of data processing activities
Controller: European Central Bank Organisational unit responsible for the processing activity: European Central Bank (ECB)/organisational unit: DG-M/MML 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-M/MML ☐ The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party [mention third party] Link to privacy statement if available

3. Purpose of the processing
The Tender Operations Platform (TOP) is an ESCB system that supports the implementation of the ECB monetary policy through the processing of ECB open market tender operations and the collection, and consolidation of bids received in a decentralized manner by euro area NCB. TOP has been developed by the Oesterreichische Nationalbank (OeNB).

The log-in/log-out times via the user's IAM (Identity Access Management) ID and detail of actions which have been carried out in the system are captured to ensure an accurate audit trail.

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):

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): Log-in/log-out times and timestamp of authorisation of actions which have been carried out in the system by each user is collected and stored by IAM auditing component. Access to TOP happens via IAM via roles management and the TOP tender modification report displays the user's IAM ID (no other personal data is stored in TOP).

(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):

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

Data are processed by third country entities:

☐ Yes

Specify to which countries:

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

IAM user IDs are retained in TOPs modification reports stored in TOP and are masked with "xxx automatically in TOP once per month" after 10 years.

The database is not cleaned and log-files can be removed after 30 days.