



RECORD OF PROCESSING ACTIVITY

Processing of personal data during on-site inspections, internal model investigations and Asset Quality Reviews that may be part of a Comprehensive Assessment.

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Contact details:

European Central Bank

Sonnemannstrasse 22

60314 Frankfurt am Main

Germany

Organisational unit responsible for the processing activity: European Central Bank (ECB)/organisational unit: Directorate General On-site & Internal Model Inspections

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 On-site & Internal Model Inspections

The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party.

Contact point at external third party (e.g. Privacy/Data Protection Officer): To be provided upon request.

[Privacy statement on the processing of personal data in the context of prudential supervision under the Single Supervisory Mechanism](#)

3. Purpose of the processing

On-site supervision is performed through on-site inspections and internal model investigations (hereinafter “inspections”). The same holds true for Asset Quality Reviews (“AQRs”) that may be part of a Comprehensive Assessment. Inspections and AQRs are in-depth investigations of risk, risk controls and governance and follow specific ECB procedures. They are conducted on the basis of the ECB’s supervisory decision, which specifies the subject matter and the purpose of the inspection (Articles 12, 9 and 11 of the SSM Regulation and Articles 142 and 143 of the SSM Framework Regulation).

Both inspections and AQRs - aimed to provide an in-depth analysis of different risks, internal control systems, business models, governance or internal models – entail the collection of information about natural persons (e.g. as staff members, customers or contractors) related to the inspected institution. Such data may include loan tape, financial statements and independent valuations reports for corporate and retail loans.

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)
- Contractors providing goods or service
- Other (please specify): Customers, staff members or contractors (natural persons) of the inspected legal entities.

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

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

- Designated ECB staff members
- Designated NCB or NCA staff members in the ESCB or SSM context
- Other (please specify): The team members (ECB and NCA staff as well as the selected external consultants) of the on-site inspection / internal model investigation / Asset Quality Review.

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

8. Retention time

The retention period is 15 years for on-site inspections and internal model investigations. The loan tape data are to be kept for 1 year. Thereafter they are deleted from the ECB Document Management System and kept appropriately anonymised in the dedicated database. For AQRs that may be part of a Comprehensive Assessment a retention period of 20 years applies.