



RECORD OF PROCESSING ACTIVITY

DARWIN (Document and Record Web Interface) audit workflow

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity:

Directorate Internal Audit (D-IA)

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 Internal Audit (D-IA)

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

Audit trails allow D-IA to maintain the metadata (who, what, when) in DARWIN. Hence, when a document is reviewed and has received comments in the context of an audit, these document revisions can be consulted in the next 15 years (retention period of audit reports).

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): username, time of action

(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): D/IA will have access, could need to display to external auditors

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

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 retention applied to the data in this DARWIN workflow should align with that of the audits for which the workflow will be used. The retention for audits is 15 years in line with the retention period for audit reports (for instance, 01.02.04.01. of the [ECB's Filing and Retention Plan](#)). Moreover, external auditors can request information related to our audits.