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ECB-PUBLIC
UPDATABLE

RECORD OF PROCESSING ACTIVITY

Publication of ECB open-source codes via the Code.europa.eu tool

1. Controller(s) of data processing activities

Controller:

Organisational unit responsible for the processing activity: European Central Bank (ECB)/DG-IS

European Commission open-source programme office

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:
Depending which organizational unit publishes an open-source project
- The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party digit-ospo@ec.europa.eu
(Commission open-source programme office)
Information:
<https://code.europa.eu/info/about/-/blob/master/README.md>

3. Purpose of the processing

The ECB provides the possibility to its staff to publish open-source code to the public. This is voluntary by any staff member subject to approval by their line management.

code.europa.eu is a platform by the European Commission open-source programme office that allows this. The source code to be published does not contain private data, but it keeps records on what which user changed what on the source code. Furthermore, issues can be filed against the project that contain who created the issue and who answered it.

See also privacy statement of code.europa.eu:

<https://code.europa.eu/info/about/-/blob/master/privacy/code-europa-privacy-statement.md>

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): limited to those who voluntary publish an open-source project

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 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): Any visitor to the platform code.europa.eu can see who has contributed to the different parts of the project. Data subjects can use pseudonyms if they configure their software for publishing accordingly.

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

Data are processed by third country entities:

- Yes
- No

8. Retention time

Personal data is kept in code.europa.eu as long as the data subject remains an active member of code.europa.eu and is deleted automatically if the profile has been inactive for three years.

Data subjects can also request the deletion of their account. Associated records to deleted accounts will be moved to system-wide 'Ghost User' account, until automatic deletion is carried out.

See privacy statement of **code.europa.eu**

<https://code.europa.eu/info/about/-/blob/master/privacy/code-europa-privacy-statement.md>