

RECORD OF PROCESSING ACTIVITY

Recording, storing and listening of telephone conversations in DG-M and DG-MIP

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity:

- Directorate General Market Infrastructure & Payments DG-MIP Market Infrastructure Management Division (MIM)
- Directorate General Market Operations DG-M [Money Market & Liquidity Division (MML); Bond Markets & International Operations Division (BMI); Financial Operations Services Division (FOS)]

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 units conducting the processing activity are:

DG-MIP Market Infrastructure Management Division (MIM) and DG-M [Money Market & Liquidity Division (MML); Bond Markets & International Operations Division (BMI); Financial Operations Services Division (FOS)]

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

For DG-M, data is also processed by British Telecom.

<https://www.bt.com/privacy-policy/>

3. Purpose of the processing

Telephone conversations may only be recorded and listened to within DG-M in order to:

- clarify the terms of a transaction or of any other communication made to market counterparties on behalf of the ECB; or
- ensure that inside information regarding the European System of Central Banks (ESCB) is safeguarded; or
- identify violations of professional secrecy or the misuse of inside information.

Within DG-MIP, the T2S Crisis Managers' conference calls are mandatorily voice recorded for the purpose of ex-post debriefing/ communication/ or possible audit and all decisions shall be summarised as well in writing. For further details, please read the [EDPS Prior Checking Opinion](#).

4. Description of the categories of data subjects

- 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): For DG-MIP, central security depositories (CSDs); for DG-M, all parties on the taped telephone conversation

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): Voice recordings

(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): For DG-M, any member of the Executive Board, Director General Legal Services or a relevant head of division, Director of Internal Audit or a relevant head of division.

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

- For DG-M, telephone conversations are stored for a period of 90 days and will automatically be deleted thereafter. Recordings relating to a disputed transaction or required for administrative, disciplinary, or criminal follow-up are retained until the dispute has been resolved or follow-up completed.
- Within DG-MIP, T2S Crisis Managers' conference calls are stored for a period of 10 years in the ECB's central storage area and will be deleted thereafter.