

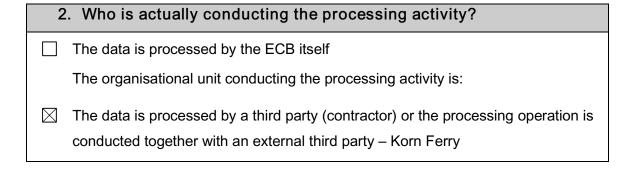
DG/HR

ECB-PUBLIC

RECORD OF PROCESSING ACTIVITY

Engagement surveys

Controller(s) of data processing activities
Controller: European Central Bank (ECB)
Organisational unit responsible for the processing activity: DG/HR
Data Protection Officer (DPO): DPO@ecb.europa.eu



3. Purpose of the processing

The purposes of the data processing for the ECB survey are as follows:

1. Survey administration and secure access:

The purpose of this processing is to issue survey invitations to eligible employees and ensure secure access for each individual using Single Sign-On (SSO). This enables one response per person and prevents duplicate

submissions or access by ineligible individuals (e.g., leavers). Data elements such as employee ID (or unique identifier), name, email address, and SSO username are processed to map invitations to the correct individual, ensure delivery accuracy, and authenticate access. These data fields are not transferred to the survey response dataset or used in analytics.

- 2. Panel management and participation metrics across survey waves:
 - The processing aims to maintain an accurate panel of invited participants and calculate participation rates at various organisational levels (e.g., division, business area). This supports tracking engagement and managing targeted reminders. Data processed for this purpose includes organisational attributes (e.g., cluster, business area, division → these are also used in analytics). Non-participant data is confined to invitation management and participation metrics and is not transferred to the survey response dataset or used in analytics.
- 3. Aggregated analytics and benchmarking:
 - The goal of this processing is to generate accurate aggregate insights across organisational and demographic segments. Pre-loaded non-sensitive metadata (e.g., age group, tenure, job title, gender) from HR systems ensures the reliability of data, reduces errors, and minimizes survey length for respondents. Furthermore, these insights allow for internal and external benchmarking, trend analysis, and targeted action planning to improve engagement, inclusion, and organisational outcomes. Aggregated results are reported without identifying individual responses.
- 4. Diversity and Inclusion insights (optional special categories of data): Special categories of data (e.g., ethnicity, disabilities, sexual orientation, gender identity) is collected only if an individual chooses to provide it, based on consent. The purpose of processing this data is to understand diverse employee experiences, monitor representation, assess the effectiveness of diversity and inclusion (D&I) initiatives, and inform equitable policies. These insights are used to promote equal opportunities, foster inclusion, and support the organisation's D&I strategy. Strict safeguards, such as aggregation thresholds and pseudonymisation, ensure privacy and confidentiality.

4.	Description of the categories of data subjects	
Whos	e personal data are being processed?	
\boxtimes	ECB staff	
\boxtimes	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):		
(b) Special categories of personal data			
The p	personal data reveals:		
\boxtimes	Racial or ethnic origin		
	Political opinions		
	Religious or philosophical beliefs		
	Trade union membership		
\boxtimes	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		
\boxtimes	Designated ECB staff members		
	Designated NCB or NCA staff members in the ESCB or SSM context		
	Other (please specify): Designated staff from Korn Ferry and Qualtrics		

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.
\boxtimes	No No

8. Retention time

For purposes unrelated to the surveys DG/HR Employee Services division retains name, employee ID, email address, SSO username, cluster, Business Area,

Division, salary band, contract type, tenure, role profile, job title, role specialisation, age and gender of employees for 10 years after all rights of data subjects related to compensation and benefits including insurances, allowances and pensions expire. The data need to remain available in order to protect the rights of data subjects concerning these services and for audit purposes. These data are not linked to any survey response.

- The above mentioned data, minimised and shared in ranges when possible, will be retained by Korn Ferry until contract end, i.e. for four years. These data are associated to survey responses where they exist but pseudonymised for Korn Ferry and Qualtrics. The survey data is only available in aggregate form to the ECB.
- Special categories of data collected through survey responses will also be retained for up to four years. When a survey response exists, these are linked to a response data record, but are available in pseudonymised form for Korn Ferry and Qualtrics, and available only in aggregate form for the ECB.