

DG/HR

ECB-PUBLIC

RECORD OF PROCESSING ACTIVITY

Engagement surveys

1. 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

2. Who is actually conducting the processing activity?

- ☐ The data is processed by the ECB itself
The organisational unit conducting the processing activity is:
- ☒ The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party – Korn Ferry

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

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):

(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): 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.

☒ 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.