

Data protection information

in accordance with Articles 13 and 14 General Data Protection Regulation (GDPR)

1. General information on data processing activity

Name:	Whistleblower system
Controller:	Oesterreichische Nationalbank (OeNB) Otto-Wagner-Platz 3, 1090 Vienna +43-(1) 40420 www.oenb.at/en/dataprotection
Data protection officer:	datenschutz@oenb.at
Purpose(s):	Purpose of the processing is the operation of an electronic whistleblowing system to receive and to process reports from employees or business partners about (suspected) criminally relevant or reputation-damaging grievances in the company in accordance with the Whistleblower Protection Act (HSchG) and ECB guidelines (ECB/2021/49 and ECB/2021/50, "Ethics Framework") as well as about fraud, embezzlement and other property offenses. The provisions of the HSchG are applied equally to all reports.
Legal basis:	<ul style="list-style-type: none"> Processing is necessary for compliance with a legal obligation to which the OeNB is subject (Article 6 para. 1 lit. c GDPR): Article 14 para. 1 ECB/2021/49; Article 8 HSchG; Article 4 para. 3 item 1 Data Protection Act. Processing is necessary for the purposes of the legitimate interests pursued by the OeNB or by a third party (Article 6 para. 1 lit. f GDPR).
Information on the OeNB's legitimate interests:	Reports on facts that go beyond those of the HSchG and the ECB Guidelines are processed on the basis of the OeNB's legitimate interest in proper business conduct and the operation of an effective internal control system.
Disclosure requirement:	Reporting persons may submit reports anonymously; a disclosure of their identity is voluntary.
Information on automated decision-making, including profiling:	Does not take place.
Information on the transfer of personal data to third countries outside the EEA:	Does not take place.

2. Content of data processing activity

Here you will find information on the nature of the personal data the OeNB processes with regard to different categories of data subjects. For each data category, information is provided on the data source, on any further purposes for which the OeNB may process these data, on whether the data will be transferred to recipients outside the OeNB (Article 4 (9) GDPR), and on how long the OeNB will, as a rule, store the data. The subsequent tables provide details on data sources, further processing for other purposes and data recipients (third parties, data processors).

Categories of data subjects	Categories of data	Data source(s)	Further purpose(s)	Data recipient(s)	Storage duration
Members of management, executives and other employees, temporary employees in the broader sense and former employees as well as business partners (notifying parties)	Name (if disclosed)	H01	---	E01, E02, A01	5 years from the last processing or transmission and beyond that for as long as it is necessary to carry out administrative or judicial proceedings that have already been initiated or investigative proceedings under the Code of Criminal Procedure (Section 8 para. 11 HSchG).
	Job title (more detailed description of the whistleblower's position in the company)	H01	---	E01, E02, A01	
	Telephone	H01	---	E01, E02, A01	
	E-Mail-Address	H01	---	E01, E02, A01	
	Reported deficiencies	H01	---	E01, E02, A01	
Members of the management, executives as well as other employees, temporary workers in the broader sense and former employees as well as business partners who are accused of an alleged wrongdoing or who are associated with such a wrongdoing (witnesses etc).	Name	H01	---	E01, E02, A01	
	Job title (more detailed description of the position in the company)	H01	---	E01, E02, A01	
	Telephone	H01	---	E01, E02, A01	
	E-Mail-Address	H01	---	E01, E02, A01	
	Reported deficiencies	H01	---	E01, E02, A01	
	Circumstances of the reported deficiencies	H01	---	E01, E02, A01	
	Data on proceedings	H01	---	E01, E02, A01	
Data on measures taken	H01	---	E01, E02, A01		

3. Data source(s)

H + serial no.	Data source(s)	Public source (yes/no)
H01	(Anonymous) person who submits a report through the whistleblower system	No

4. Transfers to third parties

If personal data are transferred to third parties (Article 4 (10) GDPR) to be processed for their own purposes, this does not necessarily mean that all datasets will be transferred in each individual case. Only those data will be transferred that are necessary to fulfill the third party's purpose(s).

E + serial no.	Recipient(s) and categories of recipients	Adequacy decision by the European Commission (Article 45 GDPR)	Purpose and legal basis (restrictions, if any)
E01	Governing Council (in the event of serious violations of ECB/2021/49)	Not applicable	Article 6 para. 1 item c GDPR: Fulfillment of the reporting obligation pursuant to Article 14 para. 3 ECB/2021/49
E02	Qualified legal representatives and competent authorities in justified cases	Not applicable	Article 6 para. 1 item c GDPR: Duty of notification pursuant to Article 78 StPO, to testify or provide evidence. Article 6 para. 1 item f GDPR: Establishment, exercise or defense of legal claims

5. Transfer of personal data to processor(s)

A + serial no.	Name, address and country of residence of data processor(s) and place(s) of processing	Adequacy decision by the European Commission (Article 45 GDPR)	Service and legal basis
A01	EQS Group AG Karlstraße 47, D-80333 München	Not required	Software as a Service (SaaS) Data processing agreement

6. Information on your rights as a data subject

You have the right to obtain confirmation as to whether or not your personal data, and which of your personal data, are being processed by the OeNB (Article 15 GDPR). You have the right to obtain the rectification of inaccurate personal data or to have incomplete personal data completed (Article 16 GDPR) as long as the rectification and/or completion of the data are necessary for the purpose of the processing operation. You have the right to obtain the erasure of your personal data if the OeNB has processed them unlawfully (Article 17 GDPR). Under certain conditions, you have the right to obtain restriction of the processing of your personal data (Article 18 GDPR). Should you consider your right to data protection infringed by any processing of your personal data by the OeNB, you may lodge a complaint with the Austrian Data Protection Authority (DSB) or bring an action before the competent civil court.

7. Right to object

You have the right to object to the processing of your personal data on grounds relating to your particular situation or where personal data are processed for direct marketing purposes (Article 21 GDPR).

8. Modalities for exercising your rights as a data subject

To exercise your rights as a data subject, please write to "Oesterreichische Nationalbank, Abteilung REFC/Datenschutz, Otto-Wagner-Platz 3, 1090 Vienna, AUSTRIA" or datenschutz@oenb.at. Please state in what way your personal data are subject to data processing by the OeNB, specifying the processing activity and outlining the details of your request. Moreover, please provide proof of your identity by enclosing a copy of an official photo identification (e.g. your passport, driver's license, identity card) or using a qualified electronic signature within the meaning of Article 3 item 12 eIDAS Regulation to prevent improper requests by unauthorized third parties that might endanger the protection of your personal data. For the reasons outlined above, such requests must be made in writing.