

Data protection information

pursuant to Articles 13 and 14 GDPR

1. General information on 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) of the processing operation:	<p>Electronic reporting system for receiving and tracking reports from employees or business partners about (suspected) criminal or reputational misconduct in the company concerning</p> <ul style="list-style-type: none"> - Corruption - Acceptance/granting of benefits - Fraud/unfaithfulness/other financial crimes - Insider trading and misuse of insider information - Criminal or reputational incidents involving business partners - Conflicts of interest and conflict-related secondary employment <p>The use of the whistleblower system by authorized persons is voluntary and does not diminish employees' internal right to submit inquiries, requests, complaints, reports or suggestions to the competent bodies, such as department management, head department management, the Executive Board or the competent works council committee, without incurring sanctions.</p> <p>Although the OeNB allows anonymous reports, it does not encourage them; rather, it assures the reporters of full confidentiality with regard to their identity if they provide it. Affected persons are informed of a report and given the opportunity to comment. The identity of the person making the report is disclosed to those affected only in the case of deliberately false accusations.</p> <p>The unit entrusted with the processing of reports is strictly separated from the other departments and has only persons as responsible employees who are specially trained and expressly responsible for the confidentiality of the reported data.</p>
Legal basis:	Processing is necessary for compliance with a legal obligation to which the OeNB is subject (Article 6 para 1 lit c GDPR): Art. 14 Abs. 1 ECB/2021/49; § 4 Abs. 3 Z 1 DSG.
Information if the provision of personal data is required:	Reporting persons may submit reports anonymously; a disclosure of their identity is voluntary.

2. Content of the data processing operation

Here you will find information on the nature of the personal data OeNB processes about different groups of data subjects. For each data category, information is provided on the data source, on any further purposes for which OeNB may process these data, on whether the data will be transferred to recipients outside the OeNB, and on how long the data, as a rule, will be stored. The subsequent tables provide details on data sources, further purposes of processing, data recipients, internal recipients and 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, P01, A01	Two (2) months after completion of the investigation (including any disciplinary action and judicial or administrative proceedings)
	Job title (more detailed description of the whistleblower's position in the company)	H01	---	E01, E02, P01, A01	
	Telephone	H01	---	E01, E02, P01, A01	
	E-Mail-Address	H01	---	E01, E02, P01, A01	
	Reported deficiencies	H01	---	E01, E02, P01, 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, P01, A01	
	Job title (more detailed description of the position in the company)	H01	---	E01, E02, P01, A01	
	Telephone	H01	---	E01, E02, P01, A01	
	E-Mail-Address	H01	---	E01, E02, P01, A01	
	Reported deficiencies	H01	---	E01, E02, P01, A01	
	Circumstances of the reported deficiencies	H01	---	E01, E02, P01, A01	
	Data on proceedings	H01	---	E01, E02, P01, A01	
	Data on measures taken	H01	---	E01, E02, P01, A01	

3. Data source(s)

H + seq. 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 to be further 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 fulfil the third party's purpose(s).

E + seq. no.	Recipient(s) and groups of recipients	Adequacy decision by the European Commission (Article 45 GDPR)	Purpose and legal basis (and restrictions, if any)
E01	Governing Council (in the event of serious violations of ECB/2021/49)	Not applicable	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: Duty of notification pursuant to § 78 StPO Article 6 para. 1 item f: establishment, exercise or defense of legal claims in conjunction with §§ 80, 109 ff StPO, § 53 SPG und §§ 384 ff ZPO

5. Transfer of personal data to processor(s)

A + seq. no.	Designation, address, country of processor's establishment and location(s) of processing	Adequacy decision by the European Commission (Article 45 GDPR)	Service description and legal basis
A01	Business Keeper AG Bayreuther Str. 35 10789 Berlin Deutschland (EWR)	Not applicable	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. Modalities for exercising your rights as a data subject

To exercise your rights as a data subject, send a letter to "Oesterreichische Nationalbank, Abteilung ITS/Datenschutz, Otto-Wagner-Platz 3, 1090 Vienna, AUSTRIA" or an e-mail to datenschutz@oenb.at. Appoint the processing activities concerning your person according to the above designation and describe your request as comprehensively and comprehensibly as possible. Please provide a proof of your identity by enclosing a black and white copy of an official identification document (e.g. your passport, driver's license, identity card) or using a qualified electronic signature pursuant to Article 3 (12) eIDAS Regulation in order to prevent improper requests by unauthorized third parties that might endanger the protection of your personal data. For the reasons stated it is not possible to exercise these rights orally.