

Mr Ribas Alegret

ECB-UNRESTRICTED

– Spain

Your letter dated 7 July 2022

15 July 2022

Dear Mr Ribas Alegret,

We refer to your communication of 7 July 2022 transmitting your complaint on a possible infringement of the Code of Conduct for high-level ECB officials and on the right to rectification under applicable data protection rules.

As to your first point we wish to respond as follows:

The ECB's Ethics Committee has considered your remarks and - leaving aside the issue of the veracity underlying the allegation - wishes to clarify that a mere membership in an entity/association whose purpose is unrelated to the activities of the ECB, and which is not combined with any functional role or specific position in that entity/association, does not qualify as private activity in the sense of the ECB's Code of Conduct and thus does not need to be included in the Declaration of Interests. Therefore, in the case at hand, there has not been and could not be any infringement of the Code of Conduct.

As regards your second point we wish to respond as follows:

The processing of personal data at the European Central Bank falls under Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (hereafter "Regulation (EU) 2018/1725").

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The right to rectification of Article 18 of Regulation (EU) 2018/1725 only applies to the personal data of the data subject (“... personal data concerning him or her.”). In the case at hand the request for rectifying personal data is an exclusive prerogative of the ECB Vice-President, while third persons are not entitled to submit such request. Therefore, your request has been assessed as void and consequently must be dismissed. If you consider that your rights under Regulation (EU) 2018/1725 have been infringed, you are entitled to lodge a complaint with the European Data Protection Supervisor at any time.

In conclusion, the ECB Vice-President has completed his Declaration of Interests in full compliance with the Code of Conduct and the applicable data protection rules.

Yours sincerely,



R. Schremser
Chief Compliance and Governance Officer
Secretary to the Ethics Committee

M.G.A. Daman
Data Protection Officer