

RECORD OF PROCESSING ACTIVITY

ADMINISTRATION OF ACCESS CONTROL SYSTEM

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: *Directorate General Corporate Services/ Directorate Administration, Security and Safety Division/ Security Operations Section (DGCS/DA/SET/SOP)*

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 together with an external third party.

In addition to internal staff, an external company providing physical security services (guarding services) has access to the access control system at defined locations with qualified staff. The maintenance and administration of the access control system is performed by an external company in a defined and controlled environment.

3. Purpose of the processing

Personal data, including an electronic photograph and a biometric template (if access is required to certain restricted areas with enhanced access control), will be used for the following purposes:

- issuing an official ECB security badge
- managing physical security, in particular controlling access to the ECB's premises and reconstructing events during security-related incidents
- aggregating (pseudonymising) data for reporting and statistics purposes.

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): ECB Pensioners

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):
 - a) Stationary data:
 - Access rights
 - Birth date
 - End date of security clearance if granted
 - Start date and end date of contract (except visitors)
 - Date of retirement (only from ECB Pensioners)
 - Personnel and badge number
 - Assigned business unit (except visitors)
 - Telephone number (except visitors)
 - Email address
 - Company name (only external staff)
 - Passport or ID number (only visitors)
 - Contact person (only visitors)
 - Picture

b) Movement data of all subjects

Date and time of access-request registration at all entry points

(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 (*encrypted biometric template of the data subject iris is stored in the badge chip, for data subjects with access to the highest security zone are authenticated by means of iris recognition system*).

- ☒ For more information, you may read [EDPS Opinion on a notification for prior checking related to the extension of a pre-existing access control system by an iris scan technology for high secure business areas](#))

- ☐ 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):

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

Refer to [ECB's Filing and Retention Plan](#)

Personal data are kept for the period necessary to fulfil the purposes outlined in part 3.

In particular:

- Movement data are kept for a maximum period of 3 months.
- Stationary personal data of ECB internal and external staff are kept for a maximum period of one year after the termination of contract.
- Stationary personal data of visitors are kept for a maximum period of one year following their last visit to the ECB's premises.