

RECORD OF PROCESSING ACTIVITY

AUTOMATED VEHICLE LICENCE PLATE RECOGNITION

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 / Division Security and Safety (DG-CS / DA / SET)*

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) monitors the video surveillance system at defined locations with qualified staff. The maintenance and administration of the video surveillance system is performed by external companies in a defined and controlled environment.

3. Purpose of the processing

The licence plate recognition system is put in place in order to control the access of vehicles to the premises of the ECB, as part of the security and safety concept of the ECB.

The licence plate recognition system aims at ensuring that only registered vehicles of ECB staff members are granted access to the ECB staff parking areas located at the ECB Main Building and Japan Centre premises.

The following records complement this processing activity:

- [Administration of the access control system](#)
- [Video Surveillance System](#)

For further details, please read the [ECB Video Surveillance Policy](#) and [the EDPS Prior Checking Opinion](#).

4. Description of the categories of data subjects

Whose personal data are being processed?

- ☒ ECB staff
- ☒ Externals (agency staff working at the ECB)
- ☐ 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 (first and last name, staff ID and badge ID)
- ☐ Education & Training details
- ☐ Employment details
- ☐ Financial details
- ☐ Family, lifestyle and social circumstances
- ☐ Goods or services provided
- ☒ Other (please give details): *Identification data of the car of the data subject: licence plate number, make, model and colour of the car.*

(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): In addition to internal Security staff, an external company providing physical security services (guarding services) monitors the automated vehicle licence plate recognition system at defined locations with qualified staff. The maintenance and administration of the systems is performed by external companies at a defined and controlled environment.

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](#)

- The ECB stores personal data related to the identification of a car for a maximum period of 10 years commencing either when the data subject's employment with the ECB ceases or following the last ECB pension payment to either the pensioner or their entitled dependants.

-The personal data captured by the cameras of the licence plate recognition system are not stored beyond the access procedure and are, as a rule, deleted immediately after the vehicle has been admitted to the staff members' garage.