EUROPEAN CENTRAL BANK

EUROSYSTEM

ECB-PUBLIC

RECORD OF PROCESSING ACTIVITY

SECURITY CLEARANCE PROCEDURE

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, Security Operations Section (DG-CS/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: *Directorate General Corporate Services – Directorate Administration, Division Security and Safety, Security Operations Section (DG-CS/DA/SET/SOP)* ☐ The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party [mention third party] Link to privacy statement if available

3. Purpose of the processing

"Security clearance" is an administrative process by which the ECB determines that there is no objection, from a security perspective, to a data subject performing duties or tasks at the ECB for which he/she has been employed or otherwise engaged, or moving unescorted within the ECB's premises.

The purpose of the security clearance rules and procedures is to support the security management at the ECB. A security clearance is mandatory prior to:

a) Taking up appointment at the ECB as staff member or external staff (consultants, agency staff, intern/trainee, secondee);
b) Authorising unescorted visitors to move within the ECB's premises.

For more information please read:

- The ECB website HERE;
- the *EDPS Prior Checking Opinion* related to the application of the security clearance rules.

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 Applicants and Candidates

5. Description of the categories of personal data processed

(a) **General personal data:**

The personal data contains:

☒ Personal details ((Gender, surname, first name, maiden name, address, date-, place- and country- of birth, e-mail address, telephone number)

☐ Education & Training details

☒ Employment details (mandatory for non-staff members and unescorted visitors: Company name and address)

☐ Financial details

☐ Family, lifestyle and social circumstances

☐ Goods or services provided

☒ Other (please give details): *Pending criminal cases and criminal records*

(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):

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

a) The security clearance file shall be retained for the period of time that the data subject has an employment contract, or is otherwise engaged with the ECB until one year after expiry or termination of the employment contract or other engagement with the ECB, but for a minimum of three years.

b) For unescorted visitors, the security clearance file shall be stored for a period of one year after the data subject's last date of access to the ECB.

c) The original paper certificate of criminal records is retained for one year after receipt, unless there are pending internal procedures (such as an administrative review, grievance or an administrative inquiry procedure) or legal proceedings stemming from a negative decision on granting a security clearance to the data subject. In these cases, the certificate of criminal records is retained for three months after the end of the appeal period.