

RECORD OF PROCESSING ACTIVITY

VIDEO SURVEILLANCE 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 (DGCS/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 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 an external company in a defined and controlled environment.

3. Purpose of the processing

The ECB operates a video surveillance system for the purpose of ensuring the security and access control of the premises.

The video surveillance system helps to:

- control access to the ECB Premises and secured areas within the ECB Premises;
- ensure the safety, security and integrity of the installations;
- ensure the safety and security of the ECB staff and visitors;
- ensure the security of property and information located or stored on site; as well as
- support investigations, either in the case of an administrative enquiry or for witnessing a security incident.

A description of the processing can be found on the [ECB Video Surveillance Policy](#)

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): *All persons on premises and in direct vicinity of premises.*

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): *Images and videos of individuals; licence plates of vehicles entering ECB premises. Limited public spaces are monitored, and at the Main Building vicinity this includes pole installations and railway structure.*

(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): *Staff of the external security contractors; In case of a security incident video footage may be transferred to the competent authorities either pro-actively or upon request, following consultation with the DPO, on a case-by-case basis.*

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](#)

Images covering the public or semi-public areas are stored for a maximum period of 21 days and then overwritten.

If any image needs to be stored longer as part of a wider investigation (e.g. in the case of an administrative inquiry) or for serving as evidence regarding a security incident, the relevant footage is quarantined and retained for as long as necessary for the specific investigation in line with the applicable retention periods.