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ECB-PUBLIC
UPDATABLE

RECORD OF PROCESSING ACTIVITY

Security clearance procedures

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Contact details:

European Central Bank

Sonnemannstrasse 22

60314 Frankfurt am Main

Germany

E-mail: info@ecb.europa.eu

Organisational unit responsible for the processing activity: Directorate General
Corporate Services/Directorate Administration - Security and Safety Division / Security
Services Section (DGCS/A/SET/SSE): mb-service_center@ecb.europa.eu

Data Protection Officer (DPO): DPO@ecb.europa.eu

2. Who is actually conducting the processing activity?

☒ The data are processed by the ECB itself

The organisational unit conducting the processing activity is: Directorate
General Corporate Services/Directorate Administration - Security and Safety
Division / Security Services Section (DGCS/A/SET/SSE)

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, secondees);
- 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

- ☒ ECB employee(s)
- ☒ 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
- ☒ Other: *ECB Applicants and Candidates*

5. Description of the categories of personal data processed

- ☒ Personal details (name, address, date and place of birth, e-mail address, telephone number, etc)
- ☒ Employment details
- ☒ Financial details
- ☒ Other: *Pending criminal cases and criminal records.*

6. The categories or recipients to whom the personal data have been or will be disclosed, including the recipient(s) of the data in Member States, third countries or international organisations

- ☒ Designated ECB staff members

7. Retention time

- 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.