

Record of Personal Data Protection of Personal Data Processing Activity, pursuant to Article 31 of Regulation (EU) 2018/1725¹

PRODUCTION OF IDENTIFICATION ACCESS CARDS

I. GENERAL INFORMATION

1) Contact Details of Controller(s) (Note 2)

Name: European Banking Authority (EBA) represented by the Executive Director

Email Address: ExecutiveOffice@eba.europa.eu.

2) Contact Details of Processor

Who is actually conducting the processing?

Department/Unit: Operations/Corporate Support

Email Address: EBA-OfficeManagement@eba.europa.eu

II. DESCRIPTION & PURPOSE OF PROCESSING

3) Description of Processing (see Note 3)

Production of identification access cards for all staff and authorised visitors within the EBA premises. All staff and authorised visitors will be required to provide their name and a digital photograph. The data will be used to produce an identification access card to allow the user access to workspaces and common areas within the EBA premises and the Europlaza building. The purpose is to provide an identification system that effectively and efficiently identifies any individual performing work or found within the EBA premises. Thus, eliminating the perception and associated reality concerning non-affiliates accessing personal workspaces and common

¹ Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC

areas; increasing accountability of contractors moving within the premises; giving the EBA staff greater impetus to call attention to suspicious persons and encouragement to verify non-affiliates before allowing them access to personal space.

4) Purpose of processing (see Note 4)

Why are the personal data being processed?

Specify the rationale and underlying reason for the processing

- Staff administration
- Relations with external parties
- Procurement, finance and accounting
- Administration of membership records
- Auditing
- Information administration

Other (please give details):

5) Lawfulness of Processing

Article 5 of Regulation (EU) 2018/1725

A. Legal Basis justifying the processing:

Article 5 of Regulation (EU) 2018/1725

Processing will be based on consent. The data subject will be asked to sign a written declaration.

B. Processing is necessary:

- for the performance of a task carried out in the public interest
- for compliance with a legal obligation to which the Controller is subject
- for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- in order to protect the vital interests of the data subject or of another natural person

Or

- x Data subject has given his/her unambiguous, free, specific and informed consent

III. CATEGORIES OF DATA SUBJECTS & PERSONAL DATA

6) Categories of Data Subjects (see Note 5)

Please tick all that apply and give details where appropriate

- EBA Temporary Agents or Contract Agents
- SNEs or trainees
- Visitors to the EBA (BoS, MB, Working Groups, Sub-Groups, Seminars, Events, other)
If yes, please specify: Any visitor coming to the EBA premises on prior approval
- Providers of good or services
- Complainants, correspondents and enquirers
- Relatives and associates of data subjects

Other (please specify):

7) Categories of personal data (see Note 6)

Please tick all that apply and give details where appropriate

(a) General personal data:

The personal data contains:

- Personal details (name, address etc) – *Full name*
- Education & Training details
- Employment details
- Financial details
- Family, lifestyle and social circumstances

Other (please give details) : Photograph

(b) Special categories of personal data:

The personal data reveals:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic or Biometric data
- Data concerning health, sex life or sexual orientation

Important Note

If you have ticked any of the sensitive data boxes contact the Data Protection Officer before processing the data further.

IV. CATEGORIES OF RECIPIENTS & DATA TRANSFERS**8) Recipient(s) of the data**

To whom is the data disclosed?

- Managers of data subjects
 - Designated EBA staff members – *Corporate Support Unit*
 - Relatives or others associated with data subjects
 - Current, past or prospective employers
 - Healthcare practitioners
 - Education/training establishments
 - Financial organisations
 - External contractor
- Other (please specify):

9) Data transfer(s)

Is the data transferred outside the EBA?

Within the EBA or to other EU Institutions/Agencies/Bodies

If yes, please specify: *Data transfer restricted only within the EBA*

To other recipients within the EU (e.g. NCAs)

To third countries

If yes, please specify:

a) the country:

b) whether suitable safeguards have been adopted:

Adequacy Decision of the European Commission²

Standard Contractual Clauses

Binding Corporate Rules

Administrative Arrangements between public Authorities

To international organisations

If yes, please specify the organisation and whether suitable safeguards have been adopted:

Important Note

If no safeguards have been put in place, please contact the DPO before processing the data further.

V. RETENTION PERIOD & SECURITY MEASURES

² Third countries for which the European Commission has issued adequacy decisions are the following: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

10) Retention period (see Note 7)

A. How long will the data be retained and what is the justification for the retention period?

The data will be retained for as long as necessary to fulfil the purpose it was collected for which coincides with the employment contract after which, it will be destroyed. In the case of consultants, experts, trainees, contractors and authorized visitors, data will be retained up until termination of their duties within the EBA premises.

B. For further processing envisaged beyond the original retention period for historical, statistical or scientific purposes, please specify whether the personal data will be anonymised:

No

Yes

11) Storage media & security of processing

A. Please indicate how and where the data processed are stored (e.g. Share Point / cloud):

The data is stored in a software installed in an offline PC

B. Technical & Organisational Security measures adopted:

Controlled access to ICT-system/controlled access codes

Restricted access to physical location where data is stored

Pseudonymisation and Encryption

Back-up

Audit trails

Confidentiality agreement/clause

Test the effectiveness of security measures adopted

Training of staff

Other (please specify):

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Consultation of the Data Protection Officer
Email Address: dpo@eba.europa.eu
Date of consultation: 25/07/19
Date of approval of processing: 30/07/2019

Privacy statement available at: available internally

Date of insertion in Register: 30/07/2019
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Guidance Notes

Note 1

Enter here the name of the processing operation involving personal data (e.g. staff recruitment, business continuity contact list)

Personal data is any information relating either directly or indirectly to a living identified or identifiable person. This information may, for example, be the name, date of birth, a telephone number, biometric data, medical data, professional details, etc.

Processing means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

Note 2

In case of more than one controller (i.e. joint processing operations), all controllers need to be listed.

Note 3

Enter any details of the processing operation that are not clear from the name of the operation entered above.

Note 4

Personal data must only be collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those processes.

Note 5

The data subject is an identified or identifiable natural person who is the subject of the personal data.

Note 6

According to Article 10 of Regulation (EU) 2018/1725, the processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, as well as of genetic and biometric data, and data concerning health and sex life or sexual orientation, is generally prohibited but exemptions may apply.

Note 7

Personal data should be kept for no longer than is necessary for the purposes for which the data were collected or for which they are further processed.