



RECORD OF PROCESSING ACTIVITY

ECB issuance of the Union laissez-passer

1. Controller(s) of data processing activities

Controller: European Central Bank

Organisational unit responsible for the processing activity:

Directorate-General Corporate Services / Directorate Administration – Security and Safety Division

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

2. Who is actually conducting the processing activity?

The roles have been contractually agreed between the European Central Bank and the European Commission¹.

- 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
- The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party:

¹ Please see the [European Commission's online record of processing activity](#).

3. Purpose of the processing

Personal data are processed for the issuance of the Union laissez-passer for staff members of the European Central Bank (ECB), staff members of institutions and special applicants.

The Union laissez-passer may be issued to all eligible institutions' applicants (according to [Council Regulation \(EU\) No 1417/2013](#) and to [Decision \(EU\) 2021/2321 of the European Central Bank](#)).

The ECB's Security and Safety Division, within the Directorate Administration of the Directorate General Corporate Services collects and uses personal data to issue Union laissez-passer to institutions' staff members or special applicants as defined by [Council Regulation \(EU\) No 1417/2013](#) with a view of facilitating their work when travelling or residing abroad for service.

The European Commission coordinates the issuance process for all the institutions' applications within a single uniform system.

The ECB, as the issuing authority, will process the personal data of eligible staff members or special applicants necessary for the issuance of the Union laissez-passer.

The Commission coordinates the implementation of Council Regulation (EU) No 1417/2013 to ensure that personal data are not made available to more persons than necessary. The ECB, however, has decided to host a dedicated enrolment centre for its staff members and if needed, externals from other institutions

The privacy statement of the issuance of the Union laissez-passer is published on the [ECB website](#).

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):
 - Staff Members of Institutions of the European Union
 - Special applicants, such family members of Union officials, Seconded National Experts and their family members and other categories defined in [Council Regulation \(EU\) No 1417/2013](#)

5. Description of the categories of personal data processed

(a) General personal data:

The personal data contains:

- Personal details (*name, surname, date of birth, place of birth, nationality, gender*, as established in **Annex I** of the [Council Regulation \(EU\) 1417/2013](#)).
- Education & Training details
- Employment details (*staff type, job information including assignment, job types, position, job titles, statutory link, external transfers or mobility, posting/address*)

Financial details

Family, lifestyle and social circumstances (*family position including the information (surname, name, date of birth, nationality, gender, address, link with the original holder) for each family member applying for a Union laissez-passer in connection with an application for or the holding of a Union laissez-passer by the original holder*).

Goods or services provided

Other (please give details): (*Union laissez-passer nr. Detailed data included in each personalised Union laissez-passer may differ following the specific requirements inherent to each demand, in particular the position in the diplomatic list of mentions*)

(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

The following biometric data are captured in all cases except for children below 12 years old that do not provide their fingerprints:

- Facial image (photo)
- Fingerprints

- Electronic signature of the holder

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 institutions' staff members

Designated NCB or NCA staff members in the ESCB or SSM context

Other (please specify): *for processing activities whereby the European Commission is the controller there may be additional recipients as described in the [European Commission's online record of processing activity](#), such as the national authorities including those of third countries, responsible for border control, security at the border, the management of lost and/or stolen documents*

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

For the data processed by the European Commission, as described in the [European Commission's online record of the related processing activity](#).

As for the ECB:

a) For hardcopies of biographical data:

- of ECB staff members: the retention period follows the general retention period of the personnel file, i.e. ten years after all rights of the staff member or dependent are extinguished.

- of other institutions' staff members: the data is only stored until the delivery of the Union laissez-passers to the applicant.

- of special applicants, including members of the family, and of ad hoc holders: the retention period should be limited to the period of validity of the Union laissez-passers (maximum six years). Biographical data that are not stored for other processes are deleted upon expiration of the validity period starting from the date of issuance of the Union laissez-passers.

At the end of those retention periods, the biographical data are erased.

b) For biometric data

The ECB deletes all digital' biographical and biometric data at the Frankfurt am Main enrolment centre from the moment of the successful reception of the enrolment data by the Commission's laissez-passer central service in Brussels. This means a few days after the encrypted sending to Brussels but no longer than three months.

At the expiration of the validity period of the Union laissez-passer, it must be returned to the Commission to be cancelled and/or partially or completely destroyed. After this process, where the Union laissez-passer is cancelled but not completely destroyed, it may be kept by the holder. In this case, the data (both biographical and biometric) continue to be accessible on the invalid Union laissez-passer under the sole responsibility of the holder. Access to biometric data would nevertheless continue to depend on the use of specific technical devices not commercially easily accessible.

c) Application form:

A copy of the application form of ECB staff members is stored during the validity period of the Union laissez-passer. The original form is sent to the Commission's laissez-passer central service in Brussels. The data is deleted when the Union laissez-passer is returned

The contractor:

For biographical data and for biometric data (facial image, fingerprints and digital signature), the retention period is limited to the time needed to issue the Union laissez-passer after successful validation and fulfilment of the acceptance process (normally a few days and up to a maximum of three months).