To be filled out in the EDPS' office

REGISTER NUMBER: 283

NOTIFICATION FOR PRIOR CHECKING

Date of submission: 09/09/2007

Case number: 2007-501

Institution: ECB

Legal basis: article 27-5 of the regulation CE 45/2001(1)

(1) OJ L 8, 12.01.2001

INFORMATION TO BE GIVEN(2)

(2) Please attach all necessary backup documents

1/ Name and address of the controller Erich Niederdorfer, European Central Bank, Security Division, Kaiserstrasse 29, 60311 Frankfurt am Main.

2/ Organisational parts of the institution or body entrusted with the processing of personal data Security Service Division, European Central Bank.

3/ Name of the processing Access control system / Iris scan system

4/ Purpose or purposes of the processing

Regulation of access to high secured within the ECB premises and for reconstruction of events during security related incidents. The high secured areas relate to critical business purposes and high functions, in particular the Main-and Backup Computer rooms in the different locations and the high sensitive of the Banknotes division.

5/ Description of the category or categories of data subjects The Iris identification system contains data of a limited number of ECB staff, consultants and subcontractors who need access to the high secured areas within the ECB premises.

6/ Description of the data or categories of data(including, if applicable, special categories of data (article 10) and/or origin of data)

The categories are: Name, personal number, business unit, biometric eye templates of both eyes, booking/access times.

7/ Information to be given to data subjects

Each new staff member/external contractor signs a declaration on the protection of personal data (Attachment 1).

8/ Procedures to grant rights of data subjects (*rights of access, to rectify, to block, to erase, to object*) The Data subjects can request access to their personal data at any time in writing by the Data controller. Furthermore they have the possibility to block their personal data via the same procedure.

9/ Automated / Manual processing operation

The name, personal number and business unit will be entered into the system in the Security Service Centre manually. The biometric iris templates will be taken via an enrolment process in the Security Service Centre. During these process templates of both eyes are taken followed by a verification test of the templates. The templates will be transferred to the Iris-server located within ECB premises which transfers the respective data to the dedicated identification units. All access protocols are stored on the Iris-server only.

10/ Storage media of data Iris-server located within ECB premises

11/ Legal basis and lawfulness of the processing operation Article 5 (a) Regulation 45/2001

12/ The recipients or categories of recipient to whom the data might be disclosed Dedicated staff in the Security Division (currently 8 persons) of the ECB: members in the Security Service Centre (operational/administrative/support) and Security Engineering section (technical support).

13/ retention policy of (categories of) personal data Erasing of files 3 months after leaving date.

13 a/ time limits for blocking and erasure of the different categories of data (on justified legitimate request from the data subject) (*Please, specify the time limits for every category, if applicable*)

for blocking: No special period foreseen and/or erasing: No special period foreseen.

15/ Proposed transfers of data to third countries or international organisations None

16/ The processing operation presents specific risk which justifies prior checking (please describe):

AS FORESEEN IN:

X Article 27.2.(a) Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures, Processing of biometric data

Article 27.2.(b) Processing operations intended to evaluate personal aspects relating to the data subject,

Article 27.2.(c)

Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,

Article 27.2.(d)

Processing operations for the purpose of excluding individuals from a right, benefit or contract,

Other (general concept in Article 27.1)

17/ Comments

PLACE AND DATE: Frankfurt am Main 23 August 2007

DATA PROTECTION OFFICER: Martin Benisch

INSTITUTION OR BODY: European Central Bank