



PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data

1. Introduction

The European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (hereafter, 'eu-LISA') is committed to protect your personal data and to respect your privacy. eu-LISA collects and further processes personal data pursuant to [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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data

The information in relation to processing operation for '*Entrance permission and access control systems for physical protection at eu-LISA*' undertaken by the Security Unit is presented below.

2. Why and how do we process your personal data?

The Security Unit collects and uses your personal information for the sole purpose of physical security, safety and access control. The access control system helps to control the access to eu-LISA premises, ensuring the security and the safety of premises, individuals and goods. It complements other physical security systems such as the video-surveillance system. It helps to prevent, detect, deter, and if necessary, investigate unauthorised physical access and security incidents in areas under surveillance. The access control system will also provide a head count after evacuation in order to assure appropriate emergency responses.

The Security Unit collects and uses personal data for the production of access badges to allow authorised persons controlled access to the premises of the Agency. The cards are programmed to allow access to specific parts of the premises related to the holders' work or are provided to demonstrate a person is authorised to access the premises (without any programmed access rights). The access cards are marked with some personal data and interact with the access control system to grant or refuse access based on the assigned permissions. The access control system creates a record of each use of the access cards in the system.

The personal data collected as part of this processing operation will not be used for an automated decision-making, including profiling.

3. On what legal ground(s) do we process your personal data

eu-LISA processes such personal data, because:

- (a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body;

The basis for the processing referred to in points (a) of Article 5(1)(a) of Regulation (EU) 2018/1725 has been laid down in Regulation 2018/1726, Article 2(b) as eu-LISA is tasked by its founding regulation to ensure the protection and continuous running of the systems under its responsibility. Furthermore, eu-LISA is mandated to ensure “the security and the maintenance of order within the buildings, premises and land used by it” (Regulation EU2018/1726, Article 38(1)), which implemented as well through the present data processing operation.

(b) processing is necessary for compliance with a legal obligation to which the controller is subject.

The specific regulations on which the processing is based include:

- Decision of Management Board no 133/2016 on security rules in eu-LISA
- Decision of Management Board no 273/2019 on the security rules for protecting EU classified information in eu-LISA
- Commission Decision 2018/559 laying down implementing rules for Article 6 of Decision 2017/46 on the security of communication and information systems in the European Commission
 - Commission Decision 2015/443 on Security in the Commission
 - Commission Decision 2015/444 on the security rules for EUCI
- Regulation 2018/1726 on the European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice (eu-LISA establishing regulation)

4. Which personal data do we collect and further process?

In order to carry out this processing operation the Security Unit collects the following categories of personal data:

- Full name.
- Photograph (only for the long-term badges)
- Fingerprints template (not the actual image of the fingerprint, but a modified/scrambled version based on the fingerprint). Once captured, the fingerprint images are immediately converted into hashes / templates by the software access application and stored inside the card, with no central database storage
- Card serial number
- Card access rights
- Access areas
- Card access history, which is a timestamped record of each card use that registers the card reader used, and a log of the event (in/out/denied etc.)
- Card/badge number, type of badge, issue and expiry date, information whether the badge has been returned or not.

The provision of personal data is mandatory to meet the above legal requirements to control access to the Agency’s sites and systems. If you do not provide your personal data, the possible consequences are that you will be unable to perform expected duties under the contract with the Agency. Personal data may be obtained via the eu-LISA Human Resources Unit, via eu-LISA contract owners or via the Contractor for whom a person requires access to eu-LISA, or directly from the data subjects themselves (e.g.: enrolment of fingerprints at the access control points or the data subjects submit the ID photo via email directly to the Security Unit of eu-LISA).

5. How long do we keep your personal data?

The Security Unit only keeps the personal data for the time necessary to fulfil the purpose of collection or further processing. The data contained in long-term badges are stored for 6 months after the expiration date of the badge, at which point they are destroyed. The data contained in short-term badges (for visitors) are deleted by the security guards within 2 hours of when the card is returned.

Data contained in the access control system are stored for a maximum of 1 year from the moment of ending the need to access the premise of eu-LISA. Data can be stored for additional periods of time in case needed for authorised security purposes (for example in order to support the investigation of security incidents).

Data about the issuance of long-term badges (for staff, SNE, interns and contractors) are kept for the period of the users contracted presence on eu-LISA sites plus 1 year.

6. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to eu-LISA staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements. Your personal data may also be shared with the personnel of security operators contracted to eu-LISA to perform security and access control processes for the Agency, who are also bound by contractual and confidentiality agreements.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

7. What are your rights and how can you exercise them?

You have specific rights as a ‘data subject’ under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor.

8. Contact information

- The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, eu-LISA Security Unit at eulisa-SECURITY@eulisa.europa.eu.

- The Data Protection Officer of eu-LISA

You may contact the Data Protection Officer (dpo@eulisa.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.