

## European Data Protection Board (EDPB) Specific Privacy Statement (SPS)

### **Registration of visitors for the purpose of granting them access to the building of the EDPB in cases of last minute registration or small groups of visitors**

Last updated: August 2024

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#### **1. Introduction**

The EDPB/EDPS building is located in premises belonging to the European Parliament.

Visitors are non-staff members of the EDPS (including of the EDPB Secretariat), of the European Parliament, or of other EU institutions and bodies<sup>1</sup> who must undergo a process of registration and accreditation in order to be granted access to the EDPS/EDPB building. While in all cases the accreditation, and in most cases, the registration of visitors of the EDPB Secretariat are managed by the European Parliament, in cases whereby the registration has to be made on a last-minute basis or for a small number of visitors (9 or less), the registration is made by staff members of the EDPB Secretariat. It is only following such registration, that the European Parliament provides the relevant accreditation to enter the EDPB/EDPS building. For the purpose of such registration, the EDPB Secretariat uses the same tool as the European Parliament.

The lawfulness of processing is ensured by compliance with Article 5(1)(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”) of Regulation (EU) 2018/1725<sup>2</sup>. As required by Article 5(2) of such Regulation, the basis for the processing shall be laid down in

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<sup>1</sup> Subject to the principle of reciprocity of access to buildings.

<sup>2</sup> [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](#)

Union law namely Article 75(5) GDPR<sup>3</sup> according to which the EDPB Secretariat provides analytical, administrative and logistical support to the EDPB.

For the purposes of audits and investigations by relevant EU bodies (e.g., European Court of Auditors), requests for access to documents under Regulation (EC) 1049/2001, and/or requests for data subject rights under Regulation 2018/1725, the lawfulness of said processing rests on Article 5(1)(b) (“processing is necessary for compliance with a legal obligation to which the controller is subject”) and (2) of Regulation 2018/1725.

## **2. What personal data do we collect, for what purpose and through which technical means?**

### ***2.1 Processed personal data***

In order to be granted access to the EDPS/EDPB premises, the EDPB Secretariat processes the following personal data:

Family name(s), first name(s), organisation, date of birth, nationality, type of official identity document and its reference number.

### ***2.2 Purpose of the processing***

The purposes of this processing operation are:

- Granting access to EDPS/EDPB premises;
- Controlling access to EDPS/EDPB premises;
- Investigating security incidents; conducting security inquiries and auxiliary investigations; evaluating threats and analysing risks.

### ***2.3 Technical means***

For the registration of the visitors, the EDPB Secretariat uses the online tool provided by the European Parliament.

## **3. Who has access to your personal data and to whom is it disclosed?**

The following entities have access to your information:

- The EDPB Secretariat’s staff members, on a need-to-do and need-to-know basis;
- The European Parliament, for purposes of granting accreditation to the visitors, as well as providing technical support in the use of the registration tool (see also the relevant privacy notice<sup>4</sup>);

<sup>3</sup> [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC \(General Data Protection Regulation\) \(Text with EEA relevance\)](#)

<sup>4</sup><https://www.europarl.europa.eu/data-protect/reportPdf/printPrivacyStatement.do;jsessionid=538ED3775AF5A0141A05980C26D46A71?prefix=V3&nr=818>

- The EDPS and the European Parliament, for purposes of following up security incidents, conducting security inquiries and auxiliary investigations, evaluating threats and analysing risks;
- EU bodies charged with monitoring or inspection tasks in application of EU law, where necessary in the context of official investigations or for audit purposes;
- Members of the public in the context of requests for access to documents, where the relevant exceptions do not apply, in accordance with Regulation 1049/2001.

#### **4. How do we protect your personal data?**

Access to the online registration tool is password protected and granted only to EDPB Secretariat staff members on a need-to-know and need-to-do basis.

Physical access to the premises of the EDPB is protected, and restricted to authorised personnel.

In case of request, personal data can only be disclosed to recipients other than EU institutions and bodies in compliance with Article 9 of Regulation (EU) 2018/1725, and provided that the data subjects have been informed about the processing and about their right to object (Articles 15-16 and 23 of such Regulation).

#### **5. How can you verify, modify or delete your personal data?**

You have the right to request from the controller (the EDPB) access to, rectification or erasure of your personal data or restriction of the processing concerning yourself. Please note that the rights provided to data subjects are not absolute rights and may be subject to exceptions, which are applied on a case-by-case basis.

You can object to the processing of your personal data on grounds relating to your particular situation, by stating said grounds in an email sent to the controller. If the controller (the EDPB) is not able to demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, it will remove the personal data categories indicated in section 2.1 above.

To exercise your rights as a data subject, see sections 8 and 9 of this SPS below.

#### **6. For how long do we keep your personal data?**

Your personal data will be kept for one year after the date of the visit. In case of security investigations, data can be kept for two years.

#### **7. What is the time limit for addressing your data subject rights' request?**

The time limit for treating your request and modifying the database fields is one month. This period may be extended by two further months where necessary, taking into account the complexity and the number of the requests. In those cases, the EDPB will inform you of the extension within one month of receipt of your request and will provide reasons for the delay.

## 8. Who can you contact to ask questions or exercise your rights?

In case you have questions, or wish to exercise your rights as a data subject, please contact the European Data Protection Board, using the following contact information:

[edpb@edpb.europa.eu](mailto:edpb@edpb.europa.eu).

You can also directly contact the EDPB Data Protection Officer at the EDPB contact page, on our [website](#) (selecting the option “Requests for the EDPB DPO”).

For the contact details of EEA SAs, please check the EDPB website (“[About EDPB / Our Members](#)”).

## 9. Complaints

Whilst we encourage you to always contact us first, you have the right to address a complaint, to the European Data Protection Supervisor (EDPS), using the following contact information:

European Data Protection Supervisor (EDPS)

Rue Wiertz 60

B-1047 Brussels, Belgium

[edps@edps.europa.eu](mailto:edps@edps.europa.eu)

<https://edps.europa.eu/>