European Investment Bank

The EU bank

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# Policy related to the recording of switchboard and security rooms incoming external phone calls

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# recording of switchboard and security rooms

# incoming external phone calls

**LEGAL NOTICE**

The present Policy does not concern phone calls with EIB's Treasury and Capital Market Departments which are continuously recorded without use of a warning tone, as notified to the European Data Protection Supervisor (EDPS).

http://www.eib.org/investor_relations/recording_of_telephone_calls.htm

# 1 Legal basis, purpose and scope

## 1.1 Legal basis

On 20 May 2014 the Management Committee of the Bank has approved the present Policy on the recording of phone calls for specific security reasons, in compliance with the European Data Protection Supervisor's (EDPS) opinion received on the matter.

## 1.2 Purpose

The purpose of this Policy is to prevent attempts to life and or damages to the integrity of persons or premises of the EIB, in the event of major security threats, which could put such values in danger.

## 1.3 Scope

The scope shall be to record the incoming telephone calls made to the EIB's switchboard and security rooms, without the use of a warning message.

# 2 Deciding bodies and conditions to be fulfilled

## 2.1 Competency and composition of the Crisis Committee

The Crisis Committee of the Bank can take the decision of activating the recording once conditions described below are met.

The Crisis Committee is chaired by the Corporate Services Director General and is composed of the Secretary General, Directors General, the Director of the Buildings and Logistic Department and Directors involved in the crisis subject.

## 2.2 Conditions requested to activate the recording

The decision of activating the recording can be taken by the Crisis Committee – upon recommendation of the Head of Security - as of the threats level 2 described below:

| | |
|---|---|
| **LEVEL 1**<br>"WHITE"<br>Basic Vigilance | *This corresponds to a normal level where no special threats have been identified. This stage corresponds to a standard level of security appropriate to the overall sensitivity of the site.* |
| **LEVEL 2**<br>"YELLOW"<br>Increased Vigilance | *This relates to a temporary change in the risk situation in response to tensions or a sense of threat. It signals the need to prepare for any abnormal situation, whether or not an unusual situation arises. This could be in case information has been received about the possibility of terrorist act, although neither the target(s) nor the timing of the attack has (have) been identified.* |
| **LEVEL 3**<br>"ORANGE"<br>Heightened Vigilance | *This level is appropriate to a threat situation that has been announced or observed. The risk of a terrorist attack also against the Bank becomes probable.* |
| **LEVEL 4**<br>"RED"<br>Exceptional Risk Situation | *Specific information has been received indicating the high probability of an imminent terrorist attack. The target and timing have been identified.* |

## 3 Data collected

### 3.1 Incoming calls

In case the recording procedure is initiated, calls will be recorded as follows:

- During office hours, incoming external calls to the switchboard will be recorded until they are forwarded to their final recipient;
- Outside office hours, incoming external calls to the switchboard will be forwarded to the security rooms and recorded until forwarded to their final recipient.

The recording of incoming external calls stops as soon as transferred to the final recipient.

### 3.2 Internal calls

Internal calls are not recorded.

### 3.3 Outgoing calls

Outgoing calls are not recorded.

## 4 Data storage in case of activation of the recording procedure

### 4.1 Retention period

Audio recordings of calls and associated data will be stored during 7 (seven) days after which they will be automatically deleted, unless there is an on-going investigation that justifies longer storage.

### 4.2 Associated data to be stored

The time, date and length of the calls as well as phone numbers (if available) will be stored.

### 4.3 Access to the recording application

Recorded data is stored in a secure manner. Only the Head of the Security unit (or his/her deputy), who is entrusted with the data processing, can have access to the recording application with an access code valid once. This code, delivered by the IT Department, is kept in a restricted area in a sealed envelope.

## 5 Transfer of Data

On request, recorded data can be transferred:

- to the Crisis Committee by the Head of the Security unit;
- to Police Authorities upon formal agreement of the Crisis Committee and information of the Data Protection Officer (DPO) of the Bank. The Crisis Committee will assess whether such transfers are necessary on a case-by-case basis. The assessment made will be documented in a register of transfers under the responsibility of the Head of the Security unit.

## 6 Information to the subjects and right of recourse

**6.1** In accordance with Article 11 of Regulation 45/2001, data subjects have the right to have access to their personal data and the right to have it rectified if incorrect. A motivated request should be addressed to the Head of Security unity, who will consult the DPO before taking a decision.

The Head of the Security unit will make the appropriate changes within 15 (fifteen) days of the request for rectification.

**6.2** Every individual has the right of recourse to the **European Data Protection Supervisor** (edps@edps.europa.eu) if they consider their rights under Regulation 45/2001 have been infringed as a result of the processing of their personal data by the Bank.

Before initiating this procedure data subjects may contact first:

**The Head of the Security unit,**
**person responsible for data processing**
100, Boulevard Konrad Adenauer
L-2950 Luxembourg
Tel : +352.4379-1
EIBsecurity@eib.org

**The Data Protection Officer (DPO) of the Bank**
100, Boulevard Konrad Adenauer
L-2950 Luxembourg
Tel : +352.4379-1
DataProtectionOfficer@eib.org

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## Contacts

### For general information:

**Information Desk**
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info@eib.org

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