



PRIVACY NOTICE

[CE CONTENU EST ÉGALEMENT DISPONIBLE EN FRANÇAIS](#)

1. WHO IS RESPONSIBLE FOR THE DATA PROCESSING?

The Banque centrale du Luxembourg (BCL), a public institution under Luxembourg law, established at 2, Bd Royal, L-2983 Luxembourg, is responsible for processing your personal data (data) it collects. The BCL is an integral part of the European System of Central Banks (ESCB).

This Privacy Notice (notice) informs you on the collected data and how the BCL processes it in compliance with Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data (GDPR), and applicable Luxembourg legislation.

For any question, please contact the Data Protection Officer (DPO) either by email at dpo@bcl.lu or by post at 2, Boulevard Royal, L-2983 Luxembourg.

2. WHO IS SUBJECT TO THIS NOTICE?

This notice applies to the BCL third parties (also referred to as you) including, but not limited to, website users, numismatic customers, visitors, depositors of mutilated banknotes and/or coins as well as representatives of BCL counterparties, service providers, entities under BCL supervision, national and international authorities and companies answering to an invitation to tender.

This notice does not apply to BCL staff members (per terms of the BCL Code of conduct applicable to its staff members) and BCL external members of its *Conseil*.

3. ARE THERE SPECIFIC INFORMATION NOTICES?

The BCL has published specific notices concerning notably the following specific data processings:

- Notice for recruitments
- Cookie policy
- Notice for BCL's Operations voice recording
- Notice for recorded and non-recorded Webex sessions
- Notice for the Securities Financing Transactions Data Store (SFTDS)

These specific notices are available at <https://www.bcl.lu/en/support/cookies1/index.html>.

4. WHAT DATA DO WE PROCESS?

The data we process includes information relating to an identified or identifiable natural person. An 'identifiable natural person' is one who can be identified, directly or indirectly, by reference to an identifier, such as an identification number.

More specifically, we notably process:

- Identification data, e.g. name, address, telephone number, email address, business contact information;
- Personal characteristics, e.g. date of birth, country of birth;

- Professional information, e.g. title, powers of attorney, professional skills, employment history;
- Identifiers issued by public bodies, e.g. passport, national identity card, tax identification number, car registration plate;
- Security and management data, e.g. records of premise presence and background checks;
- IT data, e.g. login data and browsing data.

5. WHAT IS THE LEGAL BASIS FOR COLLECTING YOUR DATA?

- When collection is needed for contract performance;
- When collection is needed to comply with our legal obligations;
- When collection is needed for to protect our legitimate interest;
- When you have expressly consented to the processing of your data.

The referenced legal basis are not exclusive of one another. Where applicable, a data processing may rely on a legal basis in addition to the one referenced.

6. FOR WHICH PURPOSES DO WE PROCESS YOUR DATA?

The BCL processes the data for the following purposes in compliance with the above mentioned legal basis.

6.1. When we perform our missions pursuant to Act of 31 December 1998 on the BCL status and missions

The data that you communicate to the BCL or that the BCL receives via authorised third parties, are your first name and surname, date of birth, e-mail and/or postal address, telephone number, details of your identification document and professional career.

This data is necessary for the BCL to carry out its missions in compliance with its legal obligations of monitoring liquidity and payment systems, monetary stability, international financial sanctions and the fight against money laundering and the financing of terrorism.


6.2. When you perform services for us

The BCL may collect and use your data, as provided by yourself, or transmitted by your employer or a company with which you are directly or indirectly linked. The legal basis then applicable is the performance of a contract between the BCL and yourself, your employer or the said company.

The data collected is notably your first and last name, your e-mail address and your job title, the name of the company, your telephone number and the car plate number when the BCL allows you to park on its parking space when visiting.

In the context of public contracts, the BCL may collect additional data relating to your professional background and data relevant to the task entrusted to you by the BCL.

On the legal basis of the BCL's legitimate interest, we also collect your entry and exit data in and inside BCL's premises. If you have been granted computing access, the BCL will also process your electronic identification data during your connections to the BCL systems and applications, and during your Internet browsing when using the wi-fi provided by the BCL. More specifically,



the BCL may collect your connections to the systems and applications, the configurations you select, the internet search terms and the website pages you visit. Some of your actions on our systems and applications will be recorded.

6.3. When you enter our premises

On the legal basis of BCL's legitimate interest or contract performance, the BCL collects your data when you enter its premises as part of a visit or a service contract.

The BCL keeps a register of visits with your first and last name, the name of your company, the reason for your visit, your contact person at the BCL and, if applicable, your car plate number. The BCL will also keep your (valid) identity document for the time you are on our premises, without keeping a copy (except for people depositing monetary signs that cannot be reimbursed immediately).

Additionally, the BCL has a video surveillance system on its premises and buildings, in order to :

- ensure personal safety and protect BCL's assets (e.g. buildings, installations, equipment)
- detect and remedy any suspicious or dangerous behaviour likely to lead to accidents or incidents;
- if necessary, direct the intervention of emergency services
- organise and supervise the rapid evacuation of people in the event of an incident.

The surveillance images collected are kept by the BCL for forty (40) days and the images collected in the Caisse's sorting rooms are kept for one year.

The images may be transmitted to the Grand Ducal Police and competent authorities.

6.4. During our open door days

On the legal basis of its legitimate interest, the BCL may collect your image during open door days, which will be kept indefinitely for archival purposes.

6.5. When you subscribe to a mailing list

You will be asked to provide your e-mail address when you subscribe to one or more mailing lists available on the BCL website on the legal basis of your marketing consent. If you request to unsubscribe, the BCL will stop sending you newsletters.

6.6. When you contact us

On the legal basis of BCL's legitimate interest, the BCL may collect your data when you send a message to the e-mail address info@bcl.lu.

In the event of a request (other than pursuant to the GDPR), the BCL will ask you to provide your first and last name, your e-mail address, details of your request and certain additional documents, where applicable, to prove your identity.

These documents enable the BCL to analyse the content of your request and to contact you.

Your personal data will be deleted or made anonymous ten (10) years after your request has been processed.

7. FOR HOW LONG DO WE KEEP YOUR DATA?

The data collected and processed by the BCL is kept for as long as is necessary to achieve the purposes pursued by the BCL. After this period, your data is deleted.

However, the BCL may continue to process your data beyond this period in the event of legal obligation.

8. WITH WHOM DO WE SHARE YOUR DATA?

Where required by law or the processing purposes, the BCL may disclose data to:

- National and European public and governmental bodies including, but not limited to, the European Central Bank and the Grand Ducal Police;
- National and European competent authorities including, but not limited to, the Commission de Surveillance du Secteur Financier as part of its task of monitoring liquidity;
- Courts, legal advisors and auditors.

When data is required to be transferred outside of the European Economic Area, then the BCL ensures that it is being done with the appropriate safeguards in compliance with the GDPR.


9. WHAT ARE THE SECURITY MEASURES?

The BCL implements appropriate technical and organisational measures to protect your data against any unauthorised or unlawful processing, destruction, loss, alteration or unauthorised disclosure.

10. WHAT ARE YOUR RIGHTS?

You have a series of rights in compliance with the GDPR of which:

- An access right to your data: You have the right to ask whether or not your data is processed by the BCL. If so, you have the right to obtain a copy of the data processed by the BCL.
- A rectification right: You have the right to request that your data be updated if it is out of date, incorrect or incomplete.
- An erasure right: You have the right to request the deletion of your data, except where the BCL has a legal right to retain it. In the latter case, you have the right to ask what legitimacy justifies the retention of this data.
- A right of processing restriction: Rather than requesting the erasure of your data, you have the right to request a restriction of processing (such as the suspension of processing in certain cases). For example, where you consider that your data is inaccurate, or where the processing is unlawful.
- A portability right: You have the right to recover your data in a structured, commonly used and machine-readable format (e.g. USB key).
- A right to object: Where the processing of your data is necessary for the pursuit of your legitimate interests or for the performance of a task carried out in the public interest, you have the right to object to it at any time - on grounds relating to your particular situation. However, you cannot object to a processing operation provided for by law.

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- A right to object to a decision taken on the basis of an automated process: In case of such automated process, including profiling, you have the right to express your point of view and to object to the taken decision where applicable.
 - A right to lodge a complaint with the supervisory authority: If you consider that the BCL did not comply with your rights, you may lodge a complaint either with the Commission nationale pour la protection des données (cnpd.lu) if you are resident in Luxembourg, or with the supervisory authority of your country of residence if you are resident outside Luxembourg.

In order to best manage any request concerning your rights, you may contact BCL's DPO which contact details are set-out at the beginning of this notice.