



EUROPEAN COMMISSION

## **PROTECTION OF YOUR PERSONAL DATA**

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

**Processing operation:** The European Commission Video Surveillance Policy

**Data Controller:** European Commission, Directorate General for Communication, COMM.D2

**Record reference:** DPR-EC-23408

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## **1. Introduction**

The European Commission (hereafter ‘the Commission’) is committed to protect your personal data and to respect your privacy. The Commission 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. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to the processing operation “Video Surveillance – footages (Analogue and Digital Storage of data for Commission Representations in the EU member states” undertaken by COMM.D.2 is presented below.

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

The European Commission Representation sites in the Member States (referred to hereafter as the Representations) collect and use your personal data to protect all persons in the Representations’ buildings as well as Representations’ assets and information. They,thus,assist the Commission in fulfilling its duty of care towards its staff members, contractors, visitors and all other persons on its premises.

To this end, the video surveillance system allows authorised Representation staff and staff members of firms supplying security services to monitor in real-time incidents taking place in our Representations’ buildings and to take appropriate actions swiftly. It also allows for the establishment of facts and the collection of evidence in the context of investigations following a security incident. Additionally, this processing operation could also include digital or manual recording of accesses of visitors, i.e. registration of visitors (on paper or on digital form) by the entry guards.

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

The processing operations on personal data are carried out under Article 5 (1) (a) of Regulation (EU) 2018/1725, **lawfulness of processing:**

“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 legal basis for processing your personal data is laid down in Article 8 (1) and (3) of Commission Decision (EU, Euratom) 2015/443 of 13 March 2015 on security in the Commission.

“1. Security of assets shall be ensured by applying appropriate physical and technical measures and corresponding procedures creating a multi-layered system.”

“3. Physical security shall have the following objectives: [...] enabling investigation and inquiry into security incidents including through checks on access and exit control log files, CCTV coverage, telephone call recordings and similar data as referred to in Article 22(2) and other information sources.”

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

Cameras film images of the immediate surroundings of the buildings, other than private areas, as well as certain rooms or passageways inside these buildings (access areas, emergency exits, secure access system (SAS), IT rooms and security doors which are clearly designated). As a consequence, image recordings of all individuals passing through the filmed areas are processed. In the context of security incidents, those recordings may be reviewed to establish the facts surrounding the incident or identify an individual under DPR-EC-00676.

Individuals who might be filmed are warned locally by the presence of specific pictograms accompanied by a text identifying the responsible Representation for processing the images and giving the address of the site.

Finally, the names and surnames of visitors may be requested by the security guards and registered in a paper or digital form.

#### **5. How long do we keep your personal data?**

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing. The recorded images, as well as the names and surnames of visitors are saved for a maximum of one month (30 days) on condition that no contentious issues occur. Where such issues arise, e.g. where a security incident is further investigated, data are kept until the end of the last possible legal procedure (as provided for under DPR-EC-00676).

#### **6. How do we protect and safeguard your personal data?**

In order to protect your personal data and taking into consideration the risk presented by the processing and the nature of the personal data being processed, the Commission has put in place a number of technical and organisational measures.

Technical measures ensure protection of each surveillance camera. The archives are stored in servers or PC located in the IT rooms or in the guard rooms or locked cabinets. The archiving servers are not connected to the networks and are accessible via credentials. Only authorised personnel can access the servers and export the data if necessary. Data are transported on removable media (USB sticks, flash memory, etc) handed over to the police or the internal investigators directly, following an authorization process that involves the Commission DGs COMM and HR.

Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need-to-know for the purposes of this processing operation.

All saved images are stored on the servers of the European Commission. All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

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

Representation statutory staff during their supervisory duty and staff members of firms supplying security services that are bound by confidentiality obligations view live images and recordings covering the building they are guarding in order to react immediately to any dangerous situation or suspected unlawful act. In appropriate cases, the Data Controller may share video surveillance images with mandated staff of the Commission Directorates and Units responsible for security or disciplinary enquiries and in particular IDOC and OLAF. Such staff abide by statutory, and when required, additional confidentiality agreements. For security inquiries carried out by HR.DS mandated staff of the Internal Inquiries team a separate data protection record (DPR-EC- 00676) is applicable.

The information we collect will not be given to any third party without prejudice to a possible transmission to competent Member State judicial or police authorities and/or to other European Institutions under certain circumstances (i.e. security incidents implicating several European Institutions).

## **8. 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.

You have the right to object to the processing on grounds relating to your particular situation, at any time to processing of personal data concerning you.

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. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

## **9. Contact information**

### **- The Data controller**

If you have comments, questions or concerns, please feel free to contact the Data Controller at D.2 functional mailbox [COMM-DATA-PROTECTION-COORDINATOR@ec.europa.eu](mailto:COMM-DATA-PROTECTION-COORDINATOR@ec.europa.eu).

### **- The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer ([DATA-PROTECTION-OFFICER@ec.europa.eu](mailto:DATA-PROTECTION-OFFICER@ec.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](mailto: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.

## **10. Where to find more detailed information?**

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to them. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-23408.