



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's DG HR and Security / Directorate Security / DS.3 Technical Security Unit

Record reference: DPR-EC-00654.1

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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 – analogue and digital storage" undertaken by the European Commission's DG HR Technical Security Unit is presented below.

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

The European Commission's DG HR Technical Security Unit (referred to hereafter as the Data Controller) collects and uses your personal data to protect all persons in European Commission buildings as well as European Commission assets and information. It thus assists 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 Commission services to monitor in real-time incidents taking place in our 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.

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) 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 (usual or potential access points, places considered at risk or places where repeated offences have been committed). 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-676.

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

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 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-676).

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 and encrypted. The archiving servers are isolated by a separate logical network to minimise the risk of cyber-attacks. Only authorised personnel can access and export the data if necessary. Data are transported on removable media (USB sticks, flash memory, etc.) and the data are readable only when the images are decrypted.

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?

The HR Security Directorate staff responsible for managing video surveillance and mandated Security Directorate investigators have access to live video surveillance images and recordings and are authorised to retrieve recorded images according to the “need-to-know” principle. 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- 676) is applicable.

Access to live video surveillance images and recordings is granted to security agents of the companies providing guards services to the Commission on a “need-to-know” basis in order to react immediately to any dangerous situation or unlawful act.

The information we collect will not be given to any third party without prejudice to a possible transmission to competent Member State judicial 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. Where applicable, you also have the right to object to the processing.

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 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,

- Technical Security Unit (HR.DS.3)
- FMB: EC-SECURITY-TECHNIQUE@ec.europa.eu

- The Data Protection Officer (DPO) of the Commission

You may contact the Data Protection Officer (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) 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-00654