# Notification to the Data Protection Officer under Article 25 of the Rules on Data Protection (Decision 235/16/COL) ('the Rules')

Changes affecting the information contained in the notification must be notified promptly to the Data Protection Officer, see Article 25(3) of the Rules.

Date of submission: 23.10.2017

#### Part 1: Processing

• Unit responsible for the processing operation

Administration

• Name of processing operation

**CCTV** 

• General description of the processing operation

Monitoring activity in areas sensitive to security breach

Sub-contractors

N/A

Automated / Manual operations

Automated: some cameras record non-stop, some only if motion is detected, depending on location.

All video data is stored on a NAS (Network Attached Storage)

Comments

N/A

Security measures

Day to day, access to data is only possible for the IT Officer(s) and the Building Assistant. Processing and alteration/deletion of data, can only be done by IT Officer(s).

### Part 2: Purpose and legal basis

• The purpose(s) of the processing operation

Data can be used for investigating any breach in security

• The legal basis of the processing operation

Reference is made to the EFTA Surveillance Authority Decision of 15 December 2016 laying down Rules on Data protection (Doc. 802433) Article 5 a.

The camera system allows to review any irregularities in access of the building. During office hours it is used as an extra tool to allow non ESA-staff access to the building.

Reference is made to the ESA Rules on the use of CCTV, doc. 852560

## Part 3: Data subjects/fields

• Categories of data subjects

Any person entering the monitored areas.

Categories of data / Data fields

Images of monitored areas.

## Part 4: Rights of the data subjects

• Information to be provided to the data subjects

At the start of their contract at the Authority, staff members are informed about the existing camera system.

Monitored areas are indicated, so all internal and external subjects are informed upon entering the monitored zones.

Procedure to grant rights

Authority procedure for data subject requests (DAR) (document no 863894)

• Retention policy and time limit

Recorded data is stored for 30 days. No backups are taken.

#### Part 5: Recipients

Categories of recipients of the data

IT Officer(s) and the Building Assistant

• Transfer of the data

Belgian Police will be given access to data in case of police report.