

Cedefop record of processing activity

Record of Cedefop activities processing personal data, based on Article 31 of 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, and repealing Regulation (EC) No. 45/2001 and Decision 1247/2002/EC.

Nr.	Item	Description
Video Surveillance CCTV		
1.	Last update of this record	26/04/2021
2.	Reference number	CDFNOT050 – Video Surveillance CCTV
3.	Name and contact details of controller	<p>Cedefop – European Centre for the Development of Vocational Training Postal address: Cedefop Service Post, Europe 123, 570 01 Thessaloniki, GREECE Telephone: (+30) 2310-490111 Email: info@cedefop.europa.eu</p> <p>Responsible department or role: Head of DRS</p> <p>Functional email address for enquiries on processing of personal data: CEDEFOP-SECURITY-OFFICER@cedefop.europa.eu</p>
4.	Name and contact details of DPO	data-protection-officer@cedefop.europa.eu
5.	Name and contact details of joint controller (where applicable)	n/a
6.	Name and contact details of processor (where applicable)	Security Officer External security company (currently G4S)

7.	Very short description and purpose of the processing	<p>Purpose of the processing: The purpose of Cedefop’s video surveillance system is to ensure the safety and security of its buildings, assets, staff members, contractors and visitors.</p> <p>Description of this processing operation: Video surveillance system using IP cameras that records analogue and digital images. The cameras operate 24 hours a day, seven days a week.</p> <p>The video surveillance system forms part of the broader security policy and helps prevent, deter, and if necessary, investigate unauthorised physical access, including unauthorised access to secure premises and protected rooms, administration documents, IT infrastructure, or operational information.</p> <p>The following areas are under Video surveillance:</p> <ul style="list-style-type: none"> • building entrances and exits (including emergency exits and the walls and fences surrounding the building or the site). Monitoring outside our building on the territory of the Greek state is limited to an absolute minimum, as recommended in Section 6.5 of the Guidelines; • the entrances and exits leading to the internal main stairs of the building and the library, separated by security doors and access control mechanisms. <p>The video surveillance system consists of twenty-six (26) colour cameras located within the internal and external area of Cedefop. Eight (8) of these cameras are rotatable (speed dome) and the other eighteen(18) are fixed.</p> <p>Legal basis of the processing operation: 5(1)(a) of Regulation (EU) 2018/1725: 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;</p>
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8.	Description of categories of persons whose data Cedefop processes and list of data categories	<p>Data subjects: The data subjects are Cedefop officials, temporary agents, contract agents, contractors, trainees, visitors.</p> <p>Categories of personal data processed: Cedefop's video surveillance system records images detected by the cameras in the area under surveillance, together with time, date and camera number. The image quality allows identification of those in the camera's area of coverage.</p>
9.	Time limit for keeping the data	The images are retained for a maximum of 7 days as suggested by the EDPS. Thereafter, all images are overwritten with new ones. If an image needs to be stored to further investigate or evidence a security incident, they may be retained as necessary. Their retention is logged and the need for retention is periodically reviewed.
10.	Recipients of the data	<p>The video surveillance system and recorded video is accessible to Cedefop security staff (Security Officer and back-up) only, who can grant and revoke access rights as well as view, copy, download recorded images. Any downloading of recorded images in response to an incident must be properly recorded and documented.</p> <p>Recipients outside the Security unit may be:</p> <ol style="list-style-type: none"> 1. Local police will be given access if needed to investigate or prosecute criminal offences; 2. Access will be given to the European Anti-fraud Office ("OLAF") in the framework of an investigation carried out by OLAF; 3. The Commission's Investigation and Disciplinary Office ("IDOC") in the context of a disciplinary investigation under the rules set out in Annex IX of the Staff Regulations of Officials of the European Communities.

11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	N/A
12.	General description of security measures where possible.	<p>Administrative measures:</p> <ol style="list-style-type: none"> 1. All outsourced personnel having access to the system (including those maintaining the equipment and the systems) go through the security clearance process individually. 2. Access is only granted to security and maintenance personnel 3. Each person who has access to the video surveillance system signs non-disclosure and confidentiality undertakings <p>Technical measures:</p> <ol style="list-style-type: none"> 1. Secured premises: physical security measures and electronic access control protect the equipment used to record and store images. 2. Access to the room is restricted to data controllers, security staff, IT staff and maintenance company. 3. Cedefop's video surveillance system is stand-alone. 4. Rotating cameras have a pre-set area of recording. Even if rotated they return automatically to this pre-set area after one minute. 5. Recorded data is encrypted in transit. 6. Monitors can only be seen by security staff. 7. Access to video surveillance storage system requires proprietary software client and is protected with username and password. 8. Privacy-friendly technological features include privacy mask capabilities in fixed cameras 9. Neighbouring properties are masked out of monitoring <p>Place where data is stored: Cedefop's Video surveillance system's administration is located in Cedefop premises. Video recordings are stored in the hard disks of the recording units of video surveillance system. Data is encrypted.</p>

13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	<i>Online Privacy Statement</i>
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