

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	25/04/2020
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 Thermi, 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: facilities@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>Description of this processing operation: Conventional video surveillance system that records analogue and digital images. The cameras operate 24 hours a day, seven days a week.</p> <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>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>Legal basis of the processing operation: Data is processed in accordance with:</p> <ul style="list-style-type: none"> • Cedefop Security Policy RB(2019)00323 • Cedefop Video Surveillance Policy RB(2019)00497
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	7 days (unless there is a request to hold data for a longer period of time)
10.	Recipients of the data	<p>Access to the Processing Operations is limited to Cedefop's security staff (Security Officer, back-up and external security contractor).</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 those individuals. 3. Each person who has access to the video surveillance system signs non-disclosure and confidentiality undertakings (See Annex 4: Confidentiality undertakings and Annex 7: list of people who have access to the video surveillance system) <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. Physical access to storage premises restricted to data controller and security staff 3. Cedefop’s network and the main computer systems are protected through a firewall 4. All cameras are connected directly to recorders through coaxial cable (IP connectivity not enabled) 5. Recorded data is encrypted in the recorder 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

		<p>8. Privacy-friendly technological features include privacy mask capabilities in fixed cameras (only 8 cameras are speed dome while the remaining 15 are fixed)</p> <p>9. Neighbouring properties are masked out of monitoring</p> <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>