

01 - Title of personal data processing	Processing of Personal Data in the context of the operations of a video-surveillance system
02 - Reference	102
03 - Submission Date	11/14/2022
04 - Last update	N/A
Part A of RECORD of processing activities according to Article 31 Regulation 2018/1725 (publically available)	Please consult the relevant EDPS guideline in your sector, if it exists, or: <a href="https://edps.europa.eu/data-protection/our-work/our-work-by-type/guidelines_en">https://edps.europa.eu/data-protection/our-work/our-work-by-type/guidelines_en</a> (this url is not working with Internet Explorer, use Chrome or Firefox).
Controller(s) of data processing operation (Article 31.1(a))	In case of more than one controller, see Article 28.
05 - Name and contact details of controller	
Controller	RICOTTA Salvatore
Unit-Sector	Resources and Support
Controller's email	<a href="mailto:salvatore.ricotta@era.europa.eu">salvatore.ricotta@era.europa.eu</a>
06 - DPO	DataProtectionOfficer@era.europa.eu 120 Rue Marc Lefrancq, 59300 Valenciennes, France Tel. +33 (0) 32 70 96 500
07 - Name, contact details of joint controller (where applicable)	
08a - Who is actually conducting the processing? (Article 31.1(a))	The data is processed by ERA (reponsible unit) itself
08b - Name and contact details of processor (where applicable)	Not applicable
Purpose of the processing (Article 31.1(b))	The reason why the personal data are processed and what is intended to achieve and the underlying reason for the processing. The individual steps used for the processing are described.If there is the need (later on) to further process the data for another purpose, the Data Subject must be informed in advance.

09 - Purpose of processing

The purpose of the processing is to ensure the security and access control of the premises. The video surveillance system helps:

- control access to the ERA premises and secured areas within the HQ building;
- ensure the safety, security and integrity of the installations;
- ensure the safety and security of the ERA staff and visitors;
- ensure the security of property and information located or stored on site;
- prevent, detect and investigate instances of theft of equipment or assets owned by ERA and its contractors, staff or site visitors, as well as support investigations, either in the case of an administrative enquiry or for witnessing a security incident.

Description of data subjects and personal data categories (Article 31.1(c))

Description of the categories of persons affected and which data about them will be processed.

10a - Data Subjects

All person entering inside ERA's premises:

- ERA staff
- Externals (resident service providers, trainees, seconded national experts)
- All visitors wishing to access ERA's premises (E.G., stakeholders, including Member State representatives, contractors providing goods and services, the general public, including visitors, correspondents, enquirers, ERA staff members' relatives);

10b - Personal data

The collected personal data for the persons, vehicle entering ERA's premises, and activities carried out around monitored areas:

- Non-nominative images recorded on video format stored on electronic media.
- Non-nominative images recorded on video format stored on electronic media.

The following surveillance methods are not employed:

- high-tech or intelligent video surveillance technology (Section 6.9 of the EDPS video-surveillance Guidelines);
- interconnection of our system with other systems (Section 6.10 of the EDPS video-surveillance Guidelines);
- covert surveillance (Section 6.11 of the EDPS video-surveillance Guidelines);
- sound recording and "talking CCTV" (Section 6.12 of the EDPS video-surveillance Guidelines).

Retention time (Article 31.1(f))

For how long data is retained and the related justification for this retention period? If appropriate, differentiate between the categories of personal data. If the retention period is unknown, please indicate the criteria for determining it.

11 - Time limit for keeping the data

30 days after the footage's date.  
If any image needs to be stored longer as part of a wider investigation (E.G., in the case of an administrative inquiry) or for serving as evidence regarding a security incident, the relevant footage is quarantined and retained for as long as necessary for the specific investigation in line with the applicable retention periods.

Recipients of the data (Article 31.1(d))

Recipients are all people to whom the personal data are disclosed ("need to know principle"). Not necessary to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS).

12 - Recipients of the data

The recipients of the personal data are:

- duly authorised personnel accessing video-surveillance system according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements. Those members of staff include ERA staff and external contractors under the supervision of the above mentioned ERA staff.
- All recipients of the data are reminded of their obligation not to use the data for any further purpose other than the ones for which they were collected.
- The personal information collected will not be communicated to third parties, except where necessary for the purposes ERA may be required to do so by law.

Transfers to third countries or International Organisations (Article 31.1(e))

If the personal data are transferred outside the EU, this needs to be specifically mentioned, since it increases the risks of the processing operation (Article 47 ).

13 - Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?

Not applicable.

General description of security measures, where possible (Article 31.1(g))

Please specify where the data are stored (paperwise and/or electronically) during and after the processing. Specify how they are protected ensuring “confidentiality, integrity and availability”. State in particular the “level of security ensured, appropriate to the risk”.

14 - How is data stored? What are the security measures implemented?

The CCTV system uses a dedicated network, separated from ERA network, and protected with specific access controls measures, both physical and logical.

Information/Transparency (Article 14-15)

Information shall be given in a concise, transparent and easily accessible form, using clear and plain language.

15 - For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable) see the data protection notice

See the data protection notice available at the ERA website

15a - Data subject rights

Right to have access

Right to rectify

Right to restrict of processing

Right to data portability

Right to obtain notifications to 3rd parties

Right to have recourse

16 - Legal Basis

ED DECISION n°2085-2022