

I. RECORD OF PERSONAL DATA PROCESSING OPERATION (Article 31 of Regulation (EU) No. 2018/1725)

1.	Name of the processing operation	Video surveillance
2.	Reference number/Issue	ETF-DPR-24/Issue 2
3.	Date	30/03/2020
4.	Business owner	Renata Vallome ETF Security Officer and Facilities Coordinator Renata.Vallome@etf.europa.eu

5.	Controller	Cesare Onestini Director of the ETF Cesare.Onestini@etf.europa.eu
6.	Joint controller(s)	Not applicable

7.	Processor(s)	ETF Contractor: Guards and Receptionist
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8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken DataProtectionOfficer@etf.europa.eu
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9.	Purpose of the processing	The ETF uses video surveillance system with video recording for monitoring its premises in order to guarantee safety, security and access control.
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10.	Legal basis for the processing	ETF video surveillance policy (ref. ETF/20/DEC/002)
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11.	Categories of data subjects	All people and vehicles transiting in the areas under surveillance.
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12.	Categories of personal data	Live images and video recording of people and vehicles
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13.	Time limits for keeping of data	Video recordings are kept for up to 48 hours after registration. In periods of closure of the ETF recordings are kept for up to 48 hours after the end of closure.
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14.	Categories of ETF recipients of data	ETF Facilities Team members have access to live images. The ETF Security Officer has access to live images as well as to video registrations in case of need to investigate a security incident. ETF Fire & Safety Team members and Staff on Duty may have access to live images in case of crisis situations. Crisis Management Team members may have access to both live and recorded images in case of crisis situations.
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15.	Categories of external recipients of data	Contracted guards and receptionists have access to live images on the system. Public law authorities may have access to video registrations when investigating an incident.
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16.	Transfers of data to third country or international organisation	Not applicable
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17.	Technical and organisational security measures	Screens displaying images collected by videocameras are only accessible/visible, with username/password restricted access, to ETF Security Officer, Facilities Team members, Guards and Receptionists. In crisis situations: Crisis Management Team
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		Video registrations are accessible by the ETF ETF Security Officer with username/password restricted access and may be shared in case of crisis with the Crisis Management Team members
18.	Information to the data subject	Privacy statement / Signs

II. COMPLIANCE CHECK AND RISK SCREENING OF PERSONAL DATA PROCESSING OPERATION (Article 26 and 39 of Regulation (EU) No. 2018/1725)

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A. Compliance check

19.	<p>Lawfulness (Legal basis and necessity for processing, point 10)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Necessary for performance of tasks in the public interest attributed by EU or MS legislation <input checked="" type="checkbox"/> Necessary for the management and functioning of the organisation <input checked="" type="checkbox"/> Necessary for compliance with legal obligation incumbent on controller <input type="checkbox"/> Necessary for performance of a contract to which the data subject is party <input type="checkbox"/> The data subject has given consent <input type="checkbox"/> Necessary in order to protect the vital interests of the data subject or of another natural person 	Details (if needed): n.a.
20.	<p>Purpose definition (Point 9)</p> <ul style="list-style-type: none"> • Do you list all purposes? • Are the purposes specified, explicit, legitimate? • Where information is also processed for other purposes, are you sure that these are not incompatible with the initial purpose(s)? 	<ul style="list-style-type: none"> • Yes • Yes • Not applicable
21.	<p>Data minimisation (Point 12)</p> <ul style="list-style-type: none"> • Do you really need all data items you plan to collect? • Are there any you could do without? 	<ul style="list-style-type: none"> • Yes • Not applicable
22.	<p>Accuracy (Point 12)</p> <ul style="list-style-type: none"> • How do you ensure that the information you process about people is accurate? • How do you rectify inaccurate information? 	<ul style="list-style-type: none"> • Not applicable • Not applicable
23.	<p>Storage limitation (Point 13)</p> <ul style="list-style-type: none"> • Explain why you chose the storage period(s) mentioned • Are they limited according to the maximum or minimum "as long as necessary, as short as possible"? • In case you only need some information for longer, can you split storage periods 	<ul style="list-style-type: none"> • 48 hours after registration (or after end of closure) allows to be able to investigate a security incident or to pass registration to the public authorities • As short as possible • Not applicable
24.	<p>Transparency (Point 18)</p> <ul style="list-style-type: none"> • How do you tell people about your processing? 	<ul style="list-style-type: none"> • A Privacy statement is published on the ETF web site, and available at Reception desk.

COMPLIANCE CHECK AND RISK SCREENING - Video surveillance

	<ul style="list-style-type: none"> If you do not want to inform people (or only inform them after the fact), consult your DPO 	<ul style="list-style-type: none"> Signs at the entry of ETF parkings and ETF building alert people that a videosurveillance system is in place Not applicable
25.	Data subjects rights (Point 18) <ul style="list-style-type: none"> Can people contact you if they want to know what you have about them, want to correct or delete the data, have it blocked or oppose to the processing? Could there be situations where you would want to refuse e.g. granting access? In case so please describe them 	<ul style="list-style-type: none"> Yes Not applicable

B. Risk screening

26.	Does the processing involve any of the following? <ul style="list-style-type: none"> Data relating to health, (suspected) criminal offences or otherwise considered sensitive Evaluation, automated decision-making or profiling Monitoring data subjects New technologies that may be considered intrusive 	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> Exclusion databases Large-scale processing of special categories of personal data (disease surveillance, pharmacovigilance, central databases for law-enforcement cooperation) Internet traffic analysis breaking encryption E-recruitment tools automatically pre-selecting/excluding candidates without human intervention 	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	<ul style="list-style-type: none"> Management of personal files Staff evaluation procedures (annual appraisal) 360° evaluations for helping staff members develop training plans Staff selection procedures Establishment of rights upon entry into service Management of leave, flexitime and telework Access control systems (non biometric) Video surveillance (limited scale) 	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Conclusions

	Actor	Date	Signature
27.	Business owner Renata Vallome ETF Security Officer and Facilities Coordinator Conclusion Threshold assessment required according to Risk screening		
	Data Protection Officer: Tiziana Ciccarone / Laurens Rijken Conclusion I confirm that a threshold assessment is required		

III. THRESHOLD ASSESSMENT OF PERSONAL DATA PROCESSING OPERATION (Article 26 and 39 of Regulation (EU) No. 2018/1725)

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A. Criteria for high risks identification

28.	Systematic and extensive evaluation of personal aspects or scoring, including profiling and predicting	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	
29.	Automated- decision making with legal or similar significant effect: processing that aims at taking decisions on data subjects	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	
30.	Systematic monitoring : processing used to observe, monitor or control data subjects, especially in publicly accessible spaces. This may cover video surveillance but also other monitoring, e.g. of staff internet use.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	The system is not used to monitor people but only to monitor the ETF premises for security and safety purposes and access control. Video registration is introduced to reduce security risks potentially resulting from the long term closure imposed by COVID-19 control measures	
31.	Sensitive data : data revealing ethnic or racial origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data for identification purposes, data concerning health or sex life or sexual orientation, criminal convictions or offences and related security measures or otherwise considered sensitive.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	
32.	Data processed on a large scale , whether based on number of people concerned and/or amount of data processed about each of them and/or permanence and/or geographical coverage	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	
33.	Datasets matched or combined from different data processing operations performed for different purposes and/or by different data controllers in a way that would exceed the reasonable expectations of the data subject.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	
34.	Data concerning vulnerable data subjects : situations where an imbalance in the relationship between the position of the data subject and the controller can be identified.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	
35.	Innovative use or applying technological or organisational solutions that can involve novel forms of data collection and usage. Indeed, the personal and social consequences of the deployment of a new technology may be unknown	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	

THRESHOLD ASSESSMENT - Video surveillance

36.	Preventing data subjects from exercising a right or using a service or a contract.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
		

B. Conclusion

	Actor	Date	Signature
37.	Business owner Renata Vallome ETF Security Officer and Facilities Coordinator		
	Conclusion No further action required		
	Data Protection Officer: Tiziana Ciccarone / Laurens Rijken		
	Conclusion I confirm that no further action is required		
	Data Controller Cesare Onestini, Director of the ETF		