

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

1.	Name of the processing operation	<b>Video surveillance</b>
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 <a href="mailto:Cesare.Onestini@etf.europa.eu">Cesare.Onestini@etf.europa.eu</a>
6.	Joint controller(s)	Not applicable
7.	Processor(s)	ETF Contractor: Guards and Receptionist
8.	Data protection officer	Tiziana Ciccarone / Laurens Rijken <a href="mailto:DataProtectionOfficer@etf.europa.eu">DataProtectionOfficer@etf.europa.eu</a>

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.
10.	Legal basis for the processing	ETF video surveillance policy (ref. ETF/20/DEC/002)
11.	Categories of data subjects	All people and vehicles transiting in the areas under surveillance.
12.	Categories of personal data	Live images and video recording of people and vehicles
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.

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.
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.
16.	Transfers of data to third country or international organisation	Not applicable

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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## RECORD - Video surveillance

		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)

Name of the processing operation	<b>Video surveillance</b>
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### A. Compliance check

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

## COMPLIANCE CHECK AND RISK SCREENING - Video surveillance

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

### B. Risk screening

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

### Conclusions

	Actor	Date	Signature
27.	<b>Business owner</b> Renata Vallome ETF Security Officer and Facilities Coordinator  <b>Conclusion</b> Threshold assessment required according to Risk screening		
	<b>Data Protection Officer:</b> Tiziana Ciccarone / Laurens Rijken  <b>Conclusion</b> 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)

Name of the processing operation	<b>Video surveillance</b>
Reference number	ETF-DPR-24/Issue 2
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#### A. Criteria for high risks identification

28.	Systematic and extensive <b>evaluation</b> of personal aspects or scoring, including profiling and predicting	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	....	
29.	Automated- <b>decision making</b> 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 <b>monitoring</b> : 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.	<b>Sensitive data</b> : 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 <b>large scale</b> , 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 <b>matched or combined</b> 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 <b>vulnerable data subjects</b> : 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.	<b>Innovative</b> 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.	<b>Preventing</b> data subjects from <b>exercising a right</b> or using a service or a contract.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	....		

### B. Conclusion

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