



## RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

according to Article 31 of [Regulation \(EU\) 2018/1725](#)

Title
<b>Video-surveillance at EFSA</b>

1) Controller(s) <sup>1</sup> of data processing activity (Article 31.1(a))
<p>EFSA unit in charge of the processing activity: Corporate Services (CORSER)</p> <p>EFSA Data Protection Officer (DPO): <a href="mailto:DataProtectionOfficer@efsa.europa.eu">DataProtectionOfficer@efsa.europa.eu</a></p> <p>Is EFSA a co-controller? <span style="margin-left: 150px;"><b>No</b></span></p> <p><b>If yes</b>, indicate who is EFSA's co-controller:</p>

2) Who is actually conducting the processing? (Article 31.1(a))
<p>The data is processed by EFSA itself <span style="float: right;"><input checked="" type="checkbox"/></span></p> <p><i>Indicate the EFSA units or teams involved in the data processing:</i></p> <ul style="list-style-type: none"> <li>- Two staff members of the Corporate Services Unit of EFSA (CORSER), including the EFSA Security Officer (SO);</li> <li>- Guards with 24/7 permanence at EFSA premises to whom video-surveillance activities are outsourced based on a procurement contract which EFSA concluded with a security services company.</li> </ul> <p>The processing operation is conducted together with an external party <span style="float: right;"><input type="checkbox"/></span></p> <p><i>Please provide below details on the external involvement:</i></p>

3) Purpose of the processing (Article 31.1(b))
<p>EFSA operates a Video-Surveillance System for controlling the access to its premises and for ensuring the security and safety of premises, individuals and things (e.g. documents, assets). The Video-surveillance Policy of EFSA, along with its attachments, describes the VSS and the safeguards taken to comply with data protection and privacy requirements.</p>

4) Legal basis and lawfulness of the processing (Article 5(a)-(d)):
<p><i>Processing necessary for:</i></p>

<sup>1</sup> The controller decides on the purposes and means of the data processing. In case of joint controllership (e.g. systems of the European Commission applied by EFSA or jointly with another agency), EFSA is a co-controller.

(a)	a task carried out in the public interest or in the exercise of official authority vested in EFSA	<input checked="" type="checkbox"/>
(b)	compliance with a legal obligation to which EFSA is subject	<input type="checkbox"/>
(c)	performance of a contract with the data subject or to prepare such contract	<input type="checkbox"/>
(d)	The data subject has given consent (ex ante, explicit, informed)	<input type="checkbox"/>

*Further details on the legal basis:*

EFSA's video surveillance implementing rules are available online:  
<http://www.efsa.europa.eu/sites/default/files/assets/videosurveillance.pdf>

5) Description of the categories of data subjects (Article 31.1(c))		
<i>Whose personal data are processed?</i>		
	EFSA statutory staff	<input checked="" type="checkbox"/>
	Other individuals working for EFSA (consultants, trainees, interims, experts)	<input checked="" type="checkbox"/>
	Stakeholders of EFSA, including Member State representatives	<input checked="" type="checkbox"/>
	Contractors of EFSA providing goods and services	<input checked="" type="checkbox"/>
	The general public, including visitors, correspondents, enquirers	<input checked="" type="checkbox"/>
	Relatives of the data subject	<input type="checkbox"/>
	Other categories of data subjects (please detail below)	<input checked="" type="checkbox"/>

*Further details concerning the data subjects whose data are processed:*

Any person recognisable directly or indirectly from images of the VSS of EFSA captured in indoor and outdoor spaces of the EFSA premises.

6) Type of personal data processed (Article 31.1(c))		
<b>a) General personal data</b>		
The personal data concerns:		
	Name, contact details and affiliation	<input type="checkbox"/>
	Details on education, expertise, profession of the person	<input type="checkbox"/>
	Curriculum vitae	<input type="checkbox"/>

Financial details	<input type="checkbox"/>
Family, lifestyle and social circumstances	<input type="checkbox"/>
Goods and services the person provides	<input type="checkbox"/>
Other personal data (please detail):	<input checked="" type="checkbox"/>
<b>b) Sensitive personal data (Article 10)</b>	
The personal data reveals:	
Racial or ethnic origin of the person	<input type="checkbox"/>
Political opinions or trade union membership	<input type="checkbox"/>
Religious or philosophical beliefs	<input type="checkbox"/>
Health data or genetic or biometric data	<input checked="" type="checkbox"/>
Information regarding the person's sex life or sexual orientation	<input type="checkbox"/>
<i>Further details concerning the personal data processed:</i>	
<ul style="list-style-type: none"> <li>- Images of persons and objects captured in live monitoring or stored in video-footage records of the VSS of EFSA, from which individuals are recognisable in a direct or indirect way (e.g. identification from images in combination with other information).</li> <li>- On the occasion of the privacy impact assessment, adjustments were made concerning the coverage of public areas adjacent to EFSA premises and the coverage of areas with increased privacy expectation, namely the EFSA canteen, cafeteria and smokers corner. For these areas, the VSS system was adjusted to focus on the security purpose and to limit as possible the privacy impact. This aspect is further detailed in the Privacy and Data Protection Impact Assessment</li> </ul>	

7) Recipients of the data (Article 31.1(d))	
Line managers of the data subject	<input type="checkbox"/>
Designated EFSA staff members	<input checked="" type="checkbox"/>
Other recipients ( <i>please specify</i> ):	<input type="checkbox"/>
<p>Access to video-footage (live &amp; records) is limited to the VSS users indicated in above point 2, i.e.:</p> <ul style="list-style-type: none"> <li>- Two staff members of CORSER Unit, including the SO; and</li> <li>- The security guards team leader and security guards with 24/7 permanence at EFSA premises.</li> </ul> <p>The access rights to the VSS system have been revised as detailed in the Audit Report. On the occasion of a VSS data protection refreshment training conducted by the DPO during February 2013, all VSS users have signed a Confidentiality Declaration.</p>	

Standard access to the VSS footage is without prejudice to possible transfers and disclosures to other persons. Access may be given to:

- Local law enforcement p (e.g. Polizia, Carabinieri) when needed, to investigate or prosecute criminal offences; and
- The European Anti-fraud Office (OLAF) in the framework of an investigation carried out by OLAF itself, by the Investigation Panel or the Disciplinary Board in the framework of an administrative inquiry or disciplinary proceeding, under the rules set forth in Annex IX of the Staff Regulations and in the EFSA Implementing Rules on Administrative Inquiries and Disciplinary Proceedings, provided that it can be reasonably expected that the transfers may help the investigation or prosecution of a sufficiently serious disciplinary or criminal offence.

All transfers and disclosures to other persons than CORSER Unit staff in charge of security issues are documented and subject to a rigorous assessment of the necessity of such transfer and the compatibility of the purposes of the transfer with the initial security and access control purpose of the processing. All transfers and disclosures are registered in the Register of retention and transfers

## 8) Transfers to recipients outside the EEA (Article 31.1 (e))

Data are transferred to third country recipients:

Yes  No

**If yes**, specify to which third country:

**If yes**, specify under which safeguards:

- |  |                          |
|--|--------------------------|
| Adequacy Decision of the European Commission           | <input type="checkbox"/> |
| Standard Contractual Clauses                           | <input type="checkbox"/> |
| Binding Corporate Rules                                | <input type="checkbox"/> |
| Memorandum of Understanding between public authorities | <input type="checkbox"/> |

## 9) Technical and organisational security measures (Article 31.1(g))

*How is the data stored?*

- |  |                          |
|--|--------------------------|
| On EFSA's Document Management System (DMS)   | <input type="checkbox"/> |
| On a shared EFSA network drive or in an Outlook folder   | <input type="checkbox"/> |
| In a paper file  | <input type="checkbox"/> |
| Using a cloud computing solution (please detail the service provider and main characteristics of the cloud solution, e.g. public, private) | <input type="checkbox"/> |

- On servers of an external service provider
- On servers of the European Commission or of another EU Institution
- In another way (*please specify*):

*Please provide some general information on the security measures applied:*

Data is stored in an integrated circuit with dedicated storage system and servers:

- Video-footage of the EFSA VSS system is stored on dedicated servers.
- Access to footage on EFSA seat is available to the SO and entitled CORSER Unit staff members directly from the VSS storage system (no remote access).
- Footage stored on the servers is automatically overwritten in accordance with the retention period of data detailed in below point (10).
- Access to the system is password protected. On the occasion of the Data Protection Audit, user access and rights have been reviewed. For reasons of system continuity, a unique access login is applied among system users. The point is addressed in the Audit report.
- All VSS users have signed a Confidentiality Declaration.

#### 10) Retention period (Article 4.1 (e))

The general retention period of recorded video-footage is maximum 7 calendar days. After this period, the records are automatically overwritten on the servers. As a result of the Audit and Privacy Impact Assessment, the retention period of footage covering public spaces outside the EFSA perimeter has been reduced to 5 working days.

#### 11) Consultation with the Information Security Officer

Was the ISO consulted on the processing operation ?

Yes  No

*If yes, please provide some details on the consultation with the ISO:*

#### 12) Information given to data subjects (Articles 15 and 16)

*Has information been provided to data subjects on the way their data is processed including how they can exercise their rights (access, rectification, objection, data portability)? Usually this information is provided in a Privacy Statement, specifying the controller's contact details. As possible, please provide a link to the relevant Privacy Statement or a description.*

- The public version of the EFSA Video Surveillance implementing rules is available online. Data subjects also can obtain a paper copy of the Policy from the Security Officer of EFSA.
- On-the-spot bilingual notices (English and Italian) have been placed at indoor spaces captured by the VSS and in Italian only at outdoor spaces. Moreover, ad hoc notices in Italian informing that recognisable images are produced also in situations of scarce luminosity by high-tech cameras with infra-red devices, will be added where necessary.

- A specific Privacy Statement on Video-Surveillance at EFSA is available at the EFSA reception. It can also be provided on demand by the Security Officer and CORSER Unit.

-Data subjects can exercise their rights at any time by contacting the Security Officer ([SecurityOfficer@efsa.europa.eu](mailto:SecurityOfficer@efsa.europa.eu)). Justified requests for blocking and erasure will be handled within 5 working days.

-As a data subject in the sense of the Regulation you may further contact the Data Protection Officer of EFSA ([DataProtectionOfficer@efsa.europa.eu](mailto:DataProtectionOfficer@efsa.europa.eu)); whilst you also have the right, at any time, to recourse to the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)).

Last update of this record: 27/02/2020

Reference: DPO/GOV/6