

PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data

1. Introduction

The European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (hereafter, 'eu-LISA') is committed to protect your personal data and to respect your privacy. eu-LISA collects and further processes personal data pursuant to [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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data.

The information in relation to processing operation "Video images of eu-LISA premises" undertaken by the eu-LISA Security Unit is presented below.

2. Why and how do we process your personal data?

Video images of person(s) that are entering eu-LISA premises in Tallinn, Strasbourg and Illkirch who are passing through areas under surveillance is to carry out a specific control which could allow the eu-LISA security team to prevent, to deter, to impede or to detect and investigate actions/events that might affect physical security of the Agency, its premises, personnel, or assets.

The video-surveillance system helps control access to the Agency's buildings and helps ensure the security, the safety of eu-LISA's staff members, contractor and visitors in general, as well as property and information located or stored on the premises.

It complements other physical security systems such as physical intrusion control system and access control system implemented. The access control system helps to control the access to eu-LISA premises, ensuring the security and the safety of premises, individuals, and goods, and the processing of personal data in that context is accounted for by other specific eu-LISA records.

The system is not used for any other purpose, for example, it is not used to monitor the work of employees or to monitor attendance. It is only in exceptional circumstances that the images may be transferred to investigatory bodies in the framework of a formal disciplinary or criminal investigation.

Your personal data will not be used for an automated decision-making including profiling.

Your personal data processed may be reused for the purpose of procedures before the EU Courts, national courts, or the European Court of Auditors.

3. On what legal ground(s) do we process your personal data?

We process your personal data, because:

(a) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body, including because it might be necessary for the management and functioning of the Agency.

The legal acts/instruments related to this processing making it necessary for the functioning of the Agency, and in particular physical security and access control to the eu-LISA premises:

- Agency General Information Security Policy
- Commission Decision C(2006) 3602 on security of information systems
- Commission Decision 2001/844/EC, Euratom

Also, eu-LISA is tasked by its founding regulation to ensure the protection and continuous running of the systems under its responsibility, and to grant an appropriate level of data and physical security, in accordance with the applicable rules, including specific provisions for each large-scale IT system (Regulation (EU)2018/1726, Articles 2(b) and 2(g)). This processing operation relates to one aspect of the protection of said systems, as eu-LISA is mandated to ensure “the security and the maintenance of order within the buildings, premises and land used by it” (Regulation EU2018/1726, Article 38(1)), and to “adopt appropriate measures, including security plans, inter alia, to prevent the unauthorised reading, copying, modification or deletion of personal data during transfers of personal data or transport of data media” (Regulation EU2018/1726, Article 11(3)). The present processing is directly connected as well with this particular legal obligation of the Agency.

The use of a video-surveillance system is necessary for the management and functioning of the Agency (for the security and access control purposes).

4. Which personal data do we collect and further process?

In order to carry out this processing operation, the eu-LISA Security Unit collects the following categories of personal data:

- Image

5. How long do we keep your personal data?

The eu-LISA Security Unit only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for 30 days from the recording, in order to be available in case there is a need to perform specific security checks, security incidents investigations or other similar/related security activities. After that period the data will be deleted.

When determining the maximum retention periods, the Agency takes also into account possible legal recourses, legal, auditing, archiving and reporting obligations.

6. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to eu-LISA staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Designated eu-LISA staff members:

- Security Unit personnel
- Those carrying out a formal internal investigation or disciplinary procedure within eu-LISA (e.g. Human Resources Unit).

Other recipients:

- Security services providers in premises (according to the article 3.2.11 of the Technical specification of the Call for tenders concerning security guard and reception services at eu-LISA and article II.6 of General condition for service contracts).
- Also, if justified, the video footage might be given according to the specific rules and regulation, to the authorised national and/or European public authorities for the purpose of lawfully performing police investigation or similar activities, such as:
 - National Police.
 - Courts.
 - The European Anti-fraud Office (“OLAF”) in the framework of an investigation carried out by OLAF.

- The Commission's Investigation and Disciplinary Office ("IDOC") in the framework of a disciplinary investigation, under the rules set forth in Annex IX of the Staff Regulations of Officials of the European Communities.
- EDPS when is carrying out an on-the-spot inspection or investigating a complaint.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

7. What are your rights and how can you exercise them?

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a).

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor.

8. Contact information:

- The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, eu-LISA Security Unit at eulisa-SECURITY@eulisa.europa.eu.

- The Data Protection Officer of eu-LISA

You may contact the Data Protection Officer (dpo@eulisa.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.